

Pamela M. Egan, WSBA No. 54736
POTOMAC LAW GROUP PLLC
2212 Queen Anne Ave. N., #836
Seattle, WA 98109
Telephone: (415) 297-0132
Email: pegan@potomacclaw.com
Counsel to the Trustee and Appellee Herein

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

IN RE

GIGA WATT, INC., a Washington
corporation,

Debtor.

Case No. 18-03197-FPC7

The Honorable Frederick P. Corbit

**APPELLEE'S DESIGNATION OF
RECORD ON APPEAL**

**(Re Appeal to District Court, Case No.
2:24-cv-00334-SAB)**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, the Potomac Law Group PLLC ("PLG" or "Appellee"), designates the following additional items to be included in the record on Jun Dam's appeal of the *Order Granting Final Application for Services Rendered*, dated September 17, 2023, ECF No. 1079.

Appellee designates documents in four sections lists below: (1) documents from the above-captioned main case, (2) documents from the adversary proceeding filed in this case captioned, *Dam v. Waldron*, Adv. Proc. No. 2:20-ap-80020-FPC, (3) documents from the adversary proceeding filed in this case captioned, *Waldron v. Perkins*, Adv. Proc. No. 2:20-ap-80031-FPC, and (4) documents from the adversary proceeding filed in this case captioned, *Waldron v. Dam*, Adv. Proc. No. 2:21-ap-80053-FPC.

In addition, this Appellee's Designation of Record on Appeal includes certain documents designated by Jun Dam, Appellant. In his Designation of Record on Appeal, Appellant did not

APPELLEE'S DESIGNATION OF RECORD -- 1

list designated documents in chronological order, did not number them, and did not list the full docket entry. Therefore, exhibits may be missed. To facilitate and ensure their inclusion in the record, PLG, appellee, designates these documents herein with a notation that Appellant has also designated them. PLG is not designating all documents designated by Appellant; but only those documents that PLG wishes to have included in the record on this appeal.

**I. DESIGNATION OF ITEMS FROM THE
ABOVE-CAPTIONED MAIN CASE**

Designa- tion No.	Date	ECF No.	Description
1	07/03/2020	631 (8 pgs)	STATUS Report for Interim Investigatory Report Signed by and the filer. Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 07/03/2020)
2	07/21/2020	650 (5 pgs)	MOTION for Clarification and for Protective Order re Ex Parte Order for Rule 2004 Examination. Filed by Ralph E Cromwell Jr on behalf of Perkins Coie LLP. (Cromwell, Ralph) (Entered: 07/21/2020)
3	8/3/2020	659 (2 pgs)	MOTION to Convert from Ch 11 to 7. Fee Amount \$15. Filed by U.S. Trustee. (Perkins, James) (Entered: 08/03/2020)
4	08/13/2020	673 (5 pgs)	ORDER Regarding Production of Documents Responsive to Rule 2004 Order and Placing Limits on the Use of Confidential Information in Such Documents (RE: 650). (NNU) (Entered: 08/13/2020)
5	09/11/2020	706 (4 pgs)	STIPULATED Motion for Preservation of Privilege. Signed by Pamela Egan for Chapter 11 Trustee Mark Waldron and the filer. (RE: Motion for Clarification 650). Filed by Ralph E Cromwell Jr on behalf of Perkins Coie LLP, Mark Waldron. (Cromwell, Ralph) (Entered: 09/11/2020)

Designation No.	Date	ECF No.	Description
6	9/14/2020	713 (3 pgs)	RESPONSE signed by Mark D. Waldron, Chapter 11 Trustee (RE: Conversions-Convert from Chapter 11659). Filed by Mark Waldron on behalf of Mark Waldron (Waldron, Mark) (Entered: 09/14/2020)
7	09/14/2020	714 (3 pgs)	STIPULATED Order Preserving Privilege Pursuant to FRE 502(d) (RE: 706) . (NNU) (Entered: 09/14/2020)
8	9/30/2020	744 (2 pgs; 2 docs)	ORDER Granting Motion to Convert Case from 11 to 7. (RE: Conversions-Convert from Chapter 11659). (NNU) (Entered: 09/30/2020)
9	09/30/2020	745 (1 pg)	APPOINTMENT of Trustee. Mark Waldron added to the case.. Filed by U.S. Trustee. (Dyer, Gary) (Entered: 09/30/2020)
10	10/27/2020	785 (1 pg)	ORDER Granting Application to Approve Employment of Potomac Law Group PLLC as Attorney for Chapter 7 Trustee (Re: # 767) . (JL) (Entered: 10/27/2020)
11	12/2/2020	828 (3 pgs)	APPLICATION to Approve Employment of Potomac Law Group, PLLC as Litigation Counsel Filed by Trustee Mark Waldron (Waldron, Mark) (Entered: 12/02/2020)
12	12/15/2020	840 (1 pg)	ORDER Granting Application to Approve Employment of Potomac Law Group, PLLC as Litigation Counsel (Re: # 828). (NNU) (Entered: 12/15/2020)
13	06/18/2021	889 (2 pgs)	MOTION For Contempt Against Jun Dam.. Filed by Pamela Marie Egan on behalf of Mark Waldron. (Egan, Pamela) (Entered: 06/18/2021)
14	06/18/2021	890 (10 pgs)	MEMORANDUM signed by Pamela M. Egan (RE: Motion for Contempt889). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 06/18/2021)

Designation No.	Date	ECF No.	Description
15	07/22/2021	903 (19 pgs)	OBJECTION (RE: Motion for Contempt889). Filed by Dennis J. McGlothlin on behalf of Jun Dam (McGlothlin, Dennis) (Entered: 07/22/2021)
16	07/29/2021	906 (9 pgs)	REPLY to J Dam's Objection to Trustee's Motion for Order to Show Cause signed by Pamela M. Egan (RE: Motion for Contempt889, Objection 903). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela). Modified on 7/30/2021 (NNU). (Entered: 07/29/2021)
17 (Also designated by Appellant)	09/27/2021	921 (29 pgs)	MEMORANDUM Opinion and Order Regarding Stay and Motion for Order To Show Cause (RE: Motion for Contempt889). (NNU) (Entered: 09/27/2021)
18 (Also designated by Appellant)	10/7/2021	922 (34 pgs; 2 docs)	NOTICE of Appeal and Statement of Election to District Court. Fee Amount \$298. Filed by Dennis J. McGlothlin on behalf of Jun Dam (RE: M
19	10/21/2021	928 (8 pgs)	APPELLANT Designation of Contents For Inclusion in Record On Appeal, STATEMENT of Issues. Filed by Dennis J. McGlothlin on behalf of Jun Dam (RE: 922 Notice of Appeal and Statement of Election, 923 Appeal Transmittal, Case Number from Appellate Court). (McGlothlin, Dennis) (Entered: 10/21/2021)
20	04/20/2022	946 (16 pgs; 2 docs)	MOTION For Authority to Incur and Pay Expenses Incident to Discovery in Perkins Adversary. Filed by Pamela Marie Egan on behalf of Mark Waldron. (Attachments: # 1 Exhibit A) (Egan, Pamela) DEPUTY Clerk Note: Docket text clarified to match pdf. Modified on 4/22/2022 (NNU). (Entered: 04/20/2022)
21	04/20/2022	947 (10 pgs)	DECLARATION in Supp. of Trustee's Mot. for Auth. to Incur and Pay Disc. Expenses Incident to Perkins Adversary signed by Mark D. Waldron (RE: Motion to Authorize Payments946). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 04/20/2022)

APPELLEE'S DESIGNATION OF RECORD -- 4

Designation No.	Date	ECF No.	Description
22	05/03/2022	958 (4 pgs)	ORDER Granting Trustee's Motion for Authority to Incur and Pay Expenses Incident to Discovery in Perkins Adversary (RE: 946) . (NNU) (Entered: 05/03/2022)
23	04/03/2023	998 (5 pgs)	MOTION to Authorize Payments. Filed by Pamela Marie Egan on behalf of Mark Waldron. (Egan, Pamela) (Entered: 04/03/2023)
24	04/03/2023	999 (3 pgs)	SUPPLEMENT to Motion - Exhibit A (Filed as LIST of Exhibit(s) Submission of Exhibit A and corrected by court) (RE: Motion to Authorize Payments998). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) Modified on 4/4/2023 (CMR). (Entered: 04/03/2023)
25	04/03/2023	1000 (5 pgs)	DECLARATION in Support of Tee's Mot. for Auth. to Pay Expenses Incident to Discovery in Perkins Adv. Proc. signed by Mark D. Waldron (RE: Motion to Authorize Payments998). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 04/03/2023)
26	05/05/2023	1005 (3 pgs; 2 docs)	ORDER Granting Motion to Authorize Payments (RE: 998) (CMR) (Entered 05/05/2023)
27	08/28/2023	1007 (3 pgs)	MOTION to Approve Compromise and Settlement Pursuant to FRBP 9019 Chapter 7 Trustee's Motion for Order Approving Settlements. Filed by Pamela Marie Egan on behalf of Mark Waldron. (Egan, Pamela) (Entered: 08/28/2023)
28	08/28/2023	1008 (37 pgs)	MEMORANDUM in Support of Chapter 7 Trustee's Motion for Order Approving Settlements signed by Pamela M. Egan (RE: MOTION to Approve Compromise1007). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 08/28/2023)

APPELLEE'S DESIGNATION OF RECORD -- 5

Designation No.	Date	ECF No.	Description
29	08/28/2023	1009 (8 pgs)	DECLARATION of Mark D. Waldron in Support of Ch. 7 Trustee's Motion for Order Approving Settlements signed by Mark D. Waldron (RE: MOTION to Approve Compromise1007). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 08/28/2023)
30	08/28/2023	1010 (8 pgs)	REQUEST for Judicial Notice. Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 08/28/2023)
31 (Also designated by Appellant)	08/28/2023	1011 (221 pgs; 24 docs)	LIST of Exhibit(s) List of Exhibit in Support of Ch. 7 Trustee's Motion for Order Approving Settlements (RE: MOTION to Approve Compromise1007). (Attachments: # 1 Exhibit 1 # 2 Exhibit 1.1 # 3 Exhibit 1.1.A # 4 Exhibit 1.1.B # 5 Exhibit 1.1.C # 6 Exhibit 1.1.D # 7 Exhibit 1.1.E # 8 Exhibit Exhibit 1.1.F # 9 Exhibit 1.2 # 10 Exhibit 1.2.A # 11 Exhibit 1.2.B # 12 Exhibit 2 # 13 Exhibit 2.A # 14 Exhibit 3 # 15 Exhibit 4 # 16 Exhibit 5 # 17 Exhibit 6 # 18 Exhibit 7 # 19 Exhibit 8 # 20 Exhibit 9 # 21 Exhibit 10 # 22 Exhibit 11 # 23 Exhibit 12) Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 08/28/2023)
32	08/28/2023	1012 (2 pgs)	DECLARATION of Pamela M. Egan in Support of Ch. 7 Trustee's Motion for Order Approving Settlements signed by Pamela M. Egan (RE: MOTION to Approve Compromise1007). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 08/28/2023)
33	08/28/2023	1013 (3 pgs)	NOTICE of Hearing. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: MOTION to Approve Compromise1007). The Hearing date is set for 10/3/2023 at 02:00 PM at Zoomgov.com or call 669-254-5252, Meeting ID: 160 692 2376. (Egan, Pamela) (Entered: 08/28/2023)
34	08/30/2023	1015 (2 pgs)	NOTICE of Hearing. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Motion for Determination1014). The Hearing date is set for 10/3/2023 at 02:00 PM at Zoomgov.com or call 669-254-5252, Meeting ID: 160 692 2376. (Egan, Pamela) (Entered: 08/30/2023)

APPELLEE'S DESIGNATION OF RECORD -- 6

Designation No.	Date	ECF No.	Description
35	09/01/2023	1016 (17 pgs)	CERTIFICATE of Service. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: MOTION to Approve Compromise1007, Notice of Hearing1013, Motion for Determination1014, Notice of Hearing1015). (Egan, Pamela) (Entered: 09/01/2023)
36	09/22/2023	1021 (9 pgs; 2 docs)	OBJECTION (RE: MOTION to Approve Compromise1007, Memorandum1008, Declaration1009, List of Exhibit(s) and/or Witness(es)1011, Declaration1012, Notice of Hearing1013, Notification of1020). Filed by Benjamin A Ellison on behalf of Unsecured Creditors' Committee (Attachments: # 1 Exhibit) (Ellison, Benjamin) (Entered: 09/22/2023)
37	09/26/2023	1022 (22 pgs; 4 docs)	REPLY signed by Pamela M. Egan (RE: Objection1021). Filed by Pamela Marie Egan on behalf of Mark Waldron (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Egan, Pamela) (Entered: 09/26/2023)
38	09/26/2023	1023 (3 pgs)	DECLARATION of Mark D. Waldron in Support of Chapter 7 Trustee's Reply to Objection Filed by Mr. Ellison 1021 signed by Mark D. Waldron (RE: Reply1022). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 09/26/2023)
39	09/26/2023	1024 (4 pgs)	REQUEST for Judicial Notice. Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 09/26/2023)
40	09/26/2023	1025 (2 pgs)	DECLARATION of Pamela M. Egan in Support of Chapter 7 Trustee's Reply to Objection Filed by Mr. Ellison 1021 signed by Pamela M. Egan (RE: Reply1022). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 09/26/2023)
41	9/27/2023	1026	CERTIFICATE of Service. I, Pamela M. Egan, certify under penalty of perjury that the following is true and correct. I am over the age of eighteen. On 8/28/2023, I filed the following document(s): Notice of Chapter 7 Trustee's Motion for Order Approving Settlements and of Hearing Thereon. The recipient(s) name, address and/or email: toni@dadkp.com, quentin@dadkp.com, tblood@bholaw.com, efile@bholaw.com, toreardon@bholaw.com,

APPELLEE'S DESIGNATION OF RECORD -- 7

Designation No.	Date	ECF No.	Description
			lhurst@bholaw.com, dboyd@hummerboyd.com, kvoelker@hummerboyd.com, sbrennan@outsidegeneralcounsel.com, admin@outsidegeneralcounsel.com, rcastro@rcastrolaw.com, castro.ava@gmail.com, rcromwell@byrneskeller.com, ssandusky@byrneskeller.com, mkitamura@byrneskeller.com, docket@byrneskeller.com, doupe@ryanlaw.com, doupear96329@notify.bestcase.com, Gary.W.Dyer@usdoj.gov, salishsealegal@outlook.com, SHenrie@williamskastner.Com, DLevitin@williamskastner.Com, dhofmann@williamskastner.com, tdondero@williamskastner.com, hoog@ryanlaw.com, dhutchings@corrdowns.com, rjohnson@lukins.com, dkazemba@overcastlaw.com,, kera@overcastlaw.com, debbie@overcastlaw.com, dusty@overcastlaw.com, zachary@overcastlaw.com, kazembadr92395@notify.bestcase.com, jknox@williamskastner.com, rnelson@williamskastner.com, david@dadkp.com, amy@dadkp.com, bculee@atg.wa.gov, ben@pyklawyers.com, eboudreau@pyklawyers.com, knims@pyklawyers.com, docs@westwalaw.com, jmcwilliam@byrneskeller.com, jmcwilliam@byrneskeller.com, jbenenson@byrneskeller.com, lsweetser@byrneskeller.com, docket@byrneskeller.com, John@Mundinglaw.com, Karenchpt7@gmail.com, james.perkins@usdoj.gov, pharris@lasher.com, luksetich@lasher.com, vprollins@gmail.com, jpiskel@pyklawyers.com, emily@pyklawyers.com, rmcintyre@pyklawyers.com, diana@rieslawfirm.com, cdg@rieslawfirm.com, carrie@rieslawfirm.com, jsakay@buchalter.com, docketing@ryanlaw.com, dscalia@lawdb.com, paralegal@lawdb.com,

APPELLEE'S DESIGNATION OF RECORD -- 8

Designation No.	Date	ECF No.	Description
			tara.schleicher@foster.com, kesarah.rhine@foster.com, dan.short@painehamblen.com,sheila.espinoza@ painehamblen.com,ssmith@bssslawfirm.com, hnelson@bssslawfirm.com, USTP.REGION18.SP.ECF@usdoj.gov. Registered ECF participants are served upon filing of the document(s) based on receipt of a Notice of Electronic Filing. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: MOTION to Approve Compromise1007, Notice of Hearing1013). (Egan, Pamela) (Entered: 09/27/2023)
42	09/27/2028	1027	CERTIFICATE of Service. I, Pamela M. Egan, certify under penalty of perjury that the following is true and correct. I am over the age of eighteen. On 9/26/2023, I filed the following document(s): ECF No. 1022, Chapter 7 Trustee's Reply to Objection Filed by Mr. Ellison [ECF No. 1021] and supporting documents, ECF Nos. 1023-1025. The recipient(s) name, address and/or email: toni@dadkp.com, quentin@dadkp.com, tblood@bholaw.com, efile@bholaw.com, toreardon@bholaw.com, lhurst@bholaw.com, dboyd@hummerboyd.com, kvoelker@hummerboyd.com, sbrennan@outsidegeneralcounsel.com, admin@outsidegeneralcounsel.com, rcastro@rcastrolaw.com, castro.ava@gmail.com, rcromwell@byrneskeller.com, ssandusky@byrneskeller.com, mkitamura@byrneskeller.com, docket@byrneskeller.com, doupe@ryanlaw.com, doupear96329@notify.bestcase.com, Gary.W.Dyer@usdoj.gov, salishsealegal@outlook.com, SHenrie@williamskastner.Com,

APPELLEE'S DESIGNATION OF RECORD -- 9

Designation No.	Date	ECF No.	Description
			DLevitin@williamskastner.Com, dhofmann@williamskastner.com, tdondero@williamskastner.com, hoog@ryanlaw.com, dhutchings@corrdowns.com, rjohnson@lukins.com, dkazemba@overcastlaw.com,, kera@overcastlaw.com, debbie@overcastlaw.com, dusty@overcastlaw.com, zachary@overcastlaw.com, kazembadr92395@notify.bestcase.com, jknox@williamskastner.com, rnelson@williamskastner.com, david@dadkp.com,amy@dadkp.com, bculee@atg.wa.gov, ben@pyklawyers.com, eboudreau@pyklawyers.com, knims@pyklawyers.com, docs@westwalaw.com, jmcwilliam@byrneskeller.com, jmcwilliam@byrneskeller.com, jbenson@byrneskeller.com, lsweetser@byrneskeller.com, docket@byrneskeller.com, John@Mundinglaw.com, Karenchpt7@gmail.com, james.perkins@usdoj.gov, pharris@lasher.com, luksetich@lasher.com, vprollins@gmail.com, jpiskel@pyklawyers.com, emily@pyklawyers.com, rmcintyre@pyklawyers.com, diana@rieslawfirm.com, cdg@rieslawfirm.com, carrie@rieslawfirm.com, jsakay@buchalter.com, docketing@ryanlaw.com,

Designation No.	Date	ECF No.	Description
			dscalia@lawdbs.com, paralegal@lawdbs.com, tara.schleicher@foster.com, kesarah.rhine@foster.com, dan.short@painehamblen.com,sheila.espinoza@painehamblen.com, ssmith@bssslawfirm.com, hnelson@bssslawfirm.com, USTP.REGION18.SP.ECF@usdoj.gov. Registered ECF participants are served upon filing of the document(s) based on receipt of a Notice of Electronic Filing. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Reply1022). (Egan, Pamela) (Entered: 09/27/2023)
43	09/29/2023	1028 (3 pgs)	RESPONSE Regarding Objection of the Unsecured Creditors Committee signed by Ralph E. Cromwell, Jr. (RE: Objection1021). Filed by Ralph E Cromwell Jr on behalf of Perkins Coie LLP (Cromwell, Ralph) (Entered: 09/29/2023)
44	10/03/2023	1029 (1 pg)	PDF with attached Audio File. Court Date & Time [10/3/2023 2:00:45 PM]. File Size [22368 KB]. Run Time [00:46:36]. (JoleneBritton). (Entered: 10/03/2023)
45 (Also designated by Appellant)	10/05/2023	1031 (11 pgs; 2 docs)	ORDER (1) Approving Settlement Agreement with Perkins Coie LLP and Lowel Ness; (2) Approving Stipulation with Refael Sofair; and (3) Approving Stipulation with Timur Usmanov (RE: 1007). (CMR) (Entered: 10/05/2023)

Designation No.	Date	ECF No.	Description
46	10/19/2023	1033 (130 pgs; 4 docs)	MOTION for Relief from Stay as to first three claims asserted in the District Court, Dam v. Perkins, Case No. 2:20-cv-00464 SAB, or in the Alternative, Motion for Indicative Ruling. Fee Amount \$188. Filed by Pamela Marie Egan on behalf of Mark Waldron. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Egan, Pamela) DEPUTY Clerk Note: Entry clarified. Modified on 10/20/2023 (CMR). (Entered: 10/19/2023)
47	10/19/2023	1034 (2 pgs)	NOTICE of Motion and Notice of Hearing if Objection Received. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Motion for Relief from Stay1033). (Egan, Pamela) (Entered: 10/19/2023)
48	10/20/2023	1035 (16 pgs)	CERTIFICATE of Service. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Motion for Relief from Stay1033, Notice of Motion and Notice of Hearing if Objection Received1034). (Egan, Pamela) (Entered: 10/20/2023)
49	10/20/2023	1036	CERTIFICATE of Service. I, Pamela M. Egan, certify under penalty of perjury that the following is true and correct. I am over the age of eighteen. On 10/19/2023, I mailed by depositing in the U.S. mail, postage prepaid, the following document(s): Chapter 7 Trustee's Motion for Relief from Stay and Waiver of 14-Day Stay; In the Alternative, Chapter 7 Trustee's Motion for Indicative Ruling (ECF 1033) and Notice of Chapter 7 Trustee's Motion for Relief From Stay and Opportunity for Hearing (ECF No. 1034). The recipient(s) name, address and/or email: toni@dadkp.com, quentin@dadkp.com, tblood@bholaw.com, efile@bholaw.com, toreardon@bholaw.com, lhurst@bholaw.com, dboyd@hummerboyd.com, kvoelker@hummerboyd.com, sbrennan@outsidegeneralcounsel.com, admin@outsidegeneralcounsel.com,

Designation No.	Date	ECF No.	Description
			rcastro@rcastrolaw.com, castro.ava@gmail.com, rcromwell@byrneskeller.com, ssandusky@byrneskeller.com, mkitamura@byrneskeller.com, docket@byrneskeller.com, doupe@ryanlaw.com, doupear96329@notify.bestcase.com, Gary.W.Dyer@usdoj.gov, salishsealegal@outlook.com, SHenrie@williamskastner.Com, DLevitin@williamskastner.Com, dhofmann@williamskastner.com, tdondero@williamskastner.com, hoog@ryanlaw.com, dhutchings@corrdowns.com, rjohnson@lukins.com, dkazemba@overcastlaw.com,, kera@overcastlaw.com, debbie@overcastlaw.com, dusty@overcastlaw.com, zachary@overcastlaw.com, kazembadr92395@notify.bestcase.com, jknox@williamskastner.com, rnelson@williamskastner.com, david@dadkp.com,amy@dadkp.com, bculee@atg.wa.gov, ben@pyklawyers.com, eboudreau@pyklawyers.com, knims@pyklawyers.com, docs@westwalaw.com, jmcwilliam@byrneskeller.com, jbenson@byrneskeller.com, lsweetser@byrneskeller.com, docket@byrneskeller.com, John@Mundinglaw.com, Karenchpt7@gmail.com, james.perkins@usdoj.gov, pharris@lasher.com, luksetich@lasher.com, vprollins@gmail.com, jpiskel@pyklawyers.com, emily@pyklawyers.com, rmcintyre@pyklawyers.com, diana@rieslawfirm.com, cdg@rieslawfirm.com, carrie@rieslawfirm.com,

APPELLEE'S DESIGNATION OF RECORD -- 13

Designation No.	Date	ECF No.	Description
			jsakay@buchalter.com, docketing@ryanlaw.com, dscalia@lawdb.com, paralegal@lawdb.com, tara.schleicher@foster.com, kesarah.rhine@foster.com, dan.short@painehamblen.com, sheila.espinoza@painehamblen.com, srs@painehamblen.com, USTP.REGION18.SP.ECF@usdoj.gov. The master mailing list was retrieved on October 19, 2023. Registered ECF participants are served upon filing of the document(s) based on receipt of a Notice of Electronic Filing. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Motion for Relief from Stay1033, Notice of Motion and Notice of Hearing if Objection Received1034). (Egan, Pamela) (Entered: 10/20/2023)
50	11/10/2023	1037 (2 pgs)	ORDER Uploaded. Filed by Egan, Pamela. (RE: 1033) (Entered: 11/10/2023)
51	11/10/2023	1038	DECLARATION of No Objections. Filer represents to the Court, under penalty of perjury, that the Motion (Docket No. 1033) and Notice (Docket No. 1034), were served as documented in the Certificate of Service (Docket No. 1036). No objections have been filed (RE: Motion for Relief from Stay1033). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 11/10/2023)
52	11/21/2023	1040 (2 pgs)	ORDER Granting Motion for Relief from Stay for the limited purpose of settling the Class Action (RE: 1033). (CMR) (Entered: 11/21/2023)
53	11/21/2023	1043 (2 pgs)	WITHDRAWAL of Claim(s): 70. Filed by Timothy G. Blood on behalf of Refael Sofair (Blood, Timothy) (Entered: 07/08/2024)

Designation No.	Date	ECF No.	Description
54 (Also designated by Appellant)	07/26/2024	1044 (23 pgs)	FINAL APPLICATION for Award of Compensation for Services Rendered and Reimbursement of Expenses (LF 2016) for Potomac Law Group PLLC, Special Counsel, Period: to, Fees: \$900000, Expenses: \$1648.15.. Filed by Potomac Law Group PLLC. (Egan, Pamela) (Entered: 07/26/2024)
55 (Also designated by Appellant)	07/26/2024	1045 (3 pgs)	NOTICE of Hearing. Filed by Pamela Marie Egan on behalf of Potomac Law Group PLLC (RE: Application for Award of Compensation1044). The Hearing date is set for 9/10/2024 at 10:30 AM at US Post Office Bldg, 904 W Riverside Ave, 3rd Floor Courtroom, Spokane, WA. (Egan, Pamela) (Entered: 07/26/2024)
56	07/29/2024	1046 (18 pgs)	CERTIFICATE of Service. Filed by Pamela Marie Egan on behalf of Potomac Law Group PLLC (RE: Notice of Hearing1045). (Egan, Pamela) (Entered: 07/29/2024)
57	08/22/2024	1047 (2 pgs)	NOTICE of Appearance. Filed by Douglas R Cameron on behalf of Jun Dam (Cameron, Douglas) (Entered: 08/22/2024)
58 (Also designated by Appellant)	08/22/2024	1048 (5 pgs)	OBJECTION (RE: Application for Award of Compensation1044). Filed by Douglas R Cameron on behalf of Jun Dam (Cameron, Douglas) (Entered: 08/22/2024)
59 (Also designated by Appellant)	08/22/2024	1049 (2 pgs)	DECLARATION in Support of Objection to Contingency Fee Application signed by Jun Dam (RE: Application for Award of Compensation1044). Filed by Douglas R Cameron on behalf of Jun Dam (Cameron, Douglas) (Entered: 08/22/2024)
60	08/22/2024	1050 (2 pgs)	ORDER Uploaded. Filed by Cameron, Douglas. (RE: 1048) (Entered: 08/22/2024)

Designation No.	Date	ECF No.	Description
61 (Also designated by Appellant)	08/23/2024	1051 (5 pgs)	OBJECTION (RE: Order Awarding Compensation for Services Rendered and Reimbursement of Expenses995). Filed by John T. Winslow. (TLJ) (Entered: 08/23/2024)
62 (Also designated by Appellant)	08/27/2024	1052 (89 pgs; 6 docs)	REPLY signed by Pamela M. Egan (RE: Objection1048). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E) Filed by Pamela Marie Egan on behalf of Potomac Law Group PLLC (Egan, Pamela) (Entered: 08/27/2024)
63 (Also designated by Appellant)	08/27/2024	1053 (4 pgs)	DECLARATION of Pamela M. Egan in Support of PLG's Reply to J. Dam's Obj. to PLG's Contingency Fee Application signed by Pamela M. Egan (RE: Reply1052). Filed by Pamela Marie Egan on behalf of Potomac Law Group PLLC (Egan, Pamela) (Entered: 08/27/2024)
64 (Also designated by Appellant)	08/27/2024	1054 (3 pgs)	DECLARATION of Mark D. Waldron in Supp. of PLG's Reply to J. Dam's Obj. to PLG's Contingency Fee Application signed by Mark D. Waldron (RE: Reply1052). Filed by Pamela Marie Egan on behalf of Potomac Law Group PLLC (Egan, Pamela) (Entered: 08/27/2024)
65	08/27/2024	1055 0	CERTIFICATE of Service. I, Pamela M. Egan, certify under penalty of perjury that the following is true and correct. I am over the age of eighteen. On August 27, 2024, I filed the following document(s): PLG's Reply to J. Dam's Objection to PLG's Contingency Fee Application [ECF No. 1052]; Egan Decl. in Support of Reply [ECF No. 1053], Waldron Decl. in Support of Reply [ECF No. 1054]. The recipient(s) name, address and/or email: quentin@dadkp.com, tblood@bholaw.com, efile@bholaw.com, toreardon@bholaw.com; lhurst@bholaw.com, dboyd@hummerboyd.com, kvoelker@hummerboyd.com, sbrennan@outsidegeneralcounsel.com, admin@outsidegeneralcounsel.com, dcameron@hansonbaker.com, hwatson@hansonbaker.com, rcastro@rcastrolaw.com, castro.ava@gmail.com,

APPELLEE'S DESIGNATION OF RECORD -- 16

Designation No.	Date	ECF No.	Description
			rcromwell@byrneskeller.com, ssandusky@byrneskeller.com, mkitamura@byrneskeller.com, docket@byrneskeller.com, adoupe@buchalter.com, doupear96329@notify.bestcase.com, simmel@ryanlaw.com, Gary.W.Dyer@usdoj.gov, salishsealegal@outlook.com, scott@scotthenrie.com, DLevitin@williamskastner.Com, dhofmann@williamskastner.com, tdondero@williamskastner.com, hoog@ryanlaw.com, dhutchings@corrdowns.com, rjohnson@lukins.com, Ddkazemba@overcastlaw.com, kera@overcastlaw.com, debbie@overcastlaw.com,jose@overcastlaw.com, dusty@overcastlaw.com, jknox@williamskastner.com, rnelson@williamskastner.com, david@dadkp.com, amy@dadkp.com, bculee@atg.wa.gov, ben@pyklawyers.com, shanson@pyklawyers.com,cclaeson@pyklawyers.com, docs@westwalaw.com,jmcwilliam@byrneskeller.com, jbenson@byrneskeller.com, lsweetser@byrneskeller.com, docket@byrneskeller.com, John@Mundinglaw.com, Karenchpt7@gmail.com, james.perkins@usdoj.gov, pharris@lasher.com, luksetich@lasher.com, vprollins@gmail.com, jpiskel@pyklawyers.com, ephelps@pyklawyers.com, diana@rieslawfirm.com, cdg@rieslawfirm.com, carrie@rieslawfirm.com, jsakay@buchalter.com, pmcvay@buchalter.com, dscalia@lawdbs.com, paralegal@lawdbs.com, tara.schleicher@foster.com, kim.fergin@foster.com, kathy.meyer@foster.com, estela.acosta@foster.com, dan.short@painehamblen.com, sheila.espinoza@painehamblen.com, srs@painehamblen.com, USTP.REGION18.SP.ECF@usdoj.gov, trustee@mwaldronlaw.com, mark@mwaldronlaw.com. Registered ECF

APPELLEE'S DESIGNATION OF RECORD -- 17

Designation No.	Date	ECF No.	Description
			participants are served upon filing of the document(s) based on receipt of a Notice of Electronic Filing. Filed by Pamela Marie Egan on behalf of Potomac Law Group PLLC (RE: Application for Award of Compensation 1044 , Objection 1048 , Reply 1052 , Declaration 1053 , Declaration 1054). (Egan, Pamela) (Entered: 08/27/2024)
66	09/03/2024	1056 (210 pgs; 13 docs)	MOTION For Sanctions. Filed by Pamela Marie Egan on behalf of Mark Waldron (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K # 12 Exhibit L) (Egan, Pamela) (Entered: 09/03/2024)
67	09/03/2024	1057 (4 pgs)	DECLARATION in Supp. of Ch. Trustee's Mot. for Pre-Filing Rev. Ord. and/or Sanctions Against Jun Dam signed by Pamela M. Egan (RE: Motion for Sanctions 1056). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 09/03/2024)
68	09/03/2024	1058 (2 pgs)	NOTICE of Motion and Time to Object. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Motion for Sanctions 1056). (Egan, Pamela) (Entered: 09/03/2024)
69	09/04/2024	1059 (1 pg)	NOTIFICATION of <i>Notice of Errata re Ch. 7 T'ee's Motion for a Pre-Filing Review Order/Sanctions Against Jun Dam</i> (RE: Motion for Sanctions 1056). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 09/04/2024)
70	09/07/2024	1065 (146 pgs; 9 docs)	MOTION For Sanctions. Filed by Pamela Marie Egan on behalf of Mark Waldron. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H) (Egan, Pamela) (Entered: 09/07/2024)

Designation No.	Date	ECF No.	Description
71	09/07/2024	1066 (4 pgs)	DECLARATION of Pamela M. Egan in Support of Chapter 7 Trustee's Motion for Sanctions Against John T. Winslow signed by Pamela M. Egan (RE: Motion for Sanctions1065). Filed by Pamela Marie Egan on behalf of Mark Waldron (Egan, Pamela) (Entered: 09/07/2024)
72	09/07/2024	1067 (2 pgs)	NOTICE of Motion and Time to Object. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Motion for Sanctions1065). (Egan, Pamela) (Entered: 09/07/2024)
73	09/09/2024	1068	CERTIFICATE of Service. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Motion for Sanctions1056, Declaration1057, Notice of Motion and Time to Object1058). (Attachments: # 1 Exhibit A) (Egan, Pamela) (Entered: 09/09/2024)
74	09/09/2024	1069 (2 pgs) 0	CERTIFICATE of Service. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Motion for Sanctions1065, Declaration1066, Notice of Motion and Time to Object1067). (Egan, Pamela) (Entered: 09/09/2024)
75	09/09/2024	1070	CERTIFICATE of Service. I, Pamela M. Egan, certify under penalty of perjury that the following is true and correct. I am over the age of eighteen. On 9/7/2024, I filed the following document(s): Motion for Sanctions (ECF No. 1065); Egan Decl. in Support of Mot. Sanctions (ECF No. 1066); Notice of Motion for Sanctions (ECF No. 1067). The recipient(s) name, address and/or email: quentin@dadkp.com, tblood@bholaw.com, efile@bholaw.com, toreardon@bholaw.com; lhurst@bholaw.com, dboyd@hummerboyd.com, kvoelker@hummerboyd.com, sbrennan@outsidegeneralcounsel.com, admin@outsidegeneralcounsel.com, dcameron@hansonbaker.com, hwatson@hansonbaker.com, rcastro@rcastrolaw.com, castro.ava@gmail.com, rcromwell@byrneskeller.com,

Designation No.	Date	ECF No.	Description
			ssandusky@byrneskeller.com, mkitamura@byrneskeller.com, docket@byrneskeller.com, adoupe@buchalter.com, doupear96329@notify.bestcase.com,simmel@ryanlaw.com, Gary.W.Dyer@usdoj.gov, salishsealegal@outlook.com, scott@scotthenrie.com, DLevitin@williamskastner.Com, dhofmann@williamskastner.com, tdondero@williamskastner.com, hoog@ryanlaw.com, dhutchings@corrdowns.com, rjohnson@lukins.com, dkazemba@overcastlaw.com, kera@overcastlaw.com, debbie@overcastlaw.com,jose@overcastlaw.com, dusty@overcastlaw.com, jknox@williamskastner.com, rnelson@williamskastner.com, david@dadkp.com, amy@dadkp.com, bculee@atg.wa.gov, ben@pyklawyers.com, shanson@pyklawyers.com, cclaeson@pyklawyers.com, rroller@pyklawyers.com, docs@westwalaw.com, jmcwilliam@byrneskeller.com, jbenson@byrneskeller.com,lsweetser@byrneskeller.com,docket@byrneskeller.com, John@Mundinglaw.com, Karencpt7@gmail.com, james.perkins@usdoj.gov, pharris@lasher.com, luksetich@lasher.com, vprollins@gmail.com, jpiskel@pyklawyers.com, ephelps@pyklawyers.com, diana@rieslawfirm.com;cdg@rieslawfirm.com;c arrie@rieslawfirm.com, jsakay@buchalter.com, pmcvay@buchalter.com, dscalia@lawdb.com, paralegal@lawdb.com, dscalia@lawdb.com, paralegal@lawdb.com, tara.schleicher@foster.com, kim.fergin@foster.com, kathy.meyer@foster.com,

APPELLEE'S DESIGNATION OF RECORD -- 20

Designation No.	Date	ECF No.	Description
			estela.acosta@foster.com, dan.short@painehamblen.com, sheila.espinosa@painehamblen.com, srs@painehamblen.com, USTP.REGION18.SP.ECF@usdoj.gov, trustee@mwaldronlaw.com, mark@mwaldronlaw.com. Registered ECF participants are served upon filing of the document(s) based on receipt of a Notice of Electronic Filing. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Motion for Sanctions 1065 , Declaration 1066 , Notice of Motion and Time to Object 1067). (Egan, Pamela) (Entered: 09/09/2024)
76	09/09/2024	1072 (2 pgs)	AMENDED NOTICE of Motion and Time to Object. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Notice of Motion and Time to Object 1058). (Egan, Pamela) (Entered: 09/09/2024)
77	09/09/2024	1073 (6 pgs; 2 docs)	CERTIFICATE of Service. Filed by Pamela Marie Egan on behalf of Mark Waldron (RE: Notification of 1059 , Notice of Motion and Time to Object 1072). (Attachments: # 1 Exhibit A) (Egan, Pamela) (Entered: 09/09/2024)
78	09/10/2024	1074	MINUTE Entry. Fee Application. HELD. The court took the matter under advisement. The 3 motions recently filed by Ms. Egan are scheduled for hearing on 10/8 at 1:30 p.m. via zoom. Appearances: Pamela Marie Egan, attorney for trustee; Douglas Cameron, attorney for Jun Dam; Gary Dyer, attorney for U.S. Trustee; John Winslow, objecting token holder; and John Munding, attorney for Perkins Coie et al (RE: Application for Award of Compensation 1044). (JKB). (Entered: 09/10/2024)

Designation No.	Date	ECF No.	Description
79	09/10/2024	1075 (1 pg)	PDF with attached Audio File. Court Date & Time [9/10/2024 10:33:04 AM]. File Size [15792 KB]. Run Time [00:32:54]. (JoleneBritton). (Entered: 09/10/2024)
80	09/12/2024	1076 (2 pgs)	STIPULATED MOTION to Withdraw as Attorney. Filed by Douglas R Cameron on behalf of Jun Dam. (Cameron, Douglas) DEPUTY Clerk Note: Stipulated added to docket text. Modified on 9/13/2024 (CMR). (Entered: 09/12/2024)
81 (Also designated by Appellant)	9/17/2024	1079 (8 pgs)	ORDER Granting Compensation for Services Rendered and Reimbursement of Expenses for Potomac Law Group PLLC, Special Counsel, Fees Awarded: \$900000.00, Expenses Awarded: \$1648.15. (RE: 1044). (TJL) (Entered: 09/17/2024)
82	9/19/2024	1082 (4 pgs)	WITHDRAWAL. Filed by John T. Winslow (RE: Objection 1051). (CMR) (Entered: 09/19/2024)
83	9/23/2024	1084 (3 pgs)	WITHDRAWAL (RE: Objection 1051). Filed by John T. Winslow (CMR) (Entered: 09/23/2024)
84	09/23/2024	1085 (16 pgs)	RESPONSE signed by <i>Jun Dam</i> (RE: Motion for Sanctions 1056 , Motion for Sanctions 1061 , Motion for Sanctions 1065). Filed by Jun Dam (CMR) (Entered: 09/23/2024)
85 (Also designated by Appellant)	9/26/2024	1089 (7 pgs)	MOTION to Stay Order Pending Appeal (RE: 1079 Order Awarding Compensation for Services Rendered and Reimbursement of Expenses). Filed by Jun Dam. (CMR) (Entered: 09/26/2024)
86	10/02/2024	1097 (3 pgs; 2 docs)	ORDER Granting Motion To Withdraw As Attorney (RE: 1076). (CMR) (Entered: 10/02/2024)
87 (Also designated by Appellant)	10/03/2024	1109 (7 pgs)	MOTION to Reconsider (RE: 1079 Order Awarding Compensation for Services Rendered and Reimbursement of Expenses). Filed by Jun Dam. (TLJ) (Entered: 10/03/2024)

APPELLEE'S DESIGNATION OF RECORD -- 22

Designation No.	Date	ECF No.	Description
88	10/03/2024	1110	NOTICE of Hearing-Date assigned at the hearing held on 9/10/24 (RE: Motion for Sanctions 1056 , Motion for Sanctions 1061 , Motion for Sanctions 1065). Hearing scheduled 10/8/2024 at 01:30 PM at Judge Corbit: Zoomgov.com or call 669-254-5252, Meeting ID: 160 692 2376. Text Entry Only. (JKB) (Entered: 10/03/2024)
89	10/04/2024	1116 (12 pgs)	RESPONSE signed by <i>John T. Winslow</i> (RE: Motion for Sanctions 1065). Filed by John T. Winslow (CMR) (Entered: 10/04/2024)
90 (Also designated by Appellant)	10/07/2024	1119 (9 pgs; 2 docs)	ORDER Denying Motion for Reconsideration and Rule 59(e) Motion to Amend or Alter Judgment (RE: 1109). (TJL) (Entered: 10/07/2024)
91	10/08/2024	1121 (1 pgs)	PDF with attached Audio File. Court Date & Time [10/8/2024 1:30:27 PM]. File Size [38432 KB]. Run Time [01:20:04]. (JoleneBritton). (Entered: 10/08/2024)
92	10/09/2024	1123 (3 pgs; 2 docs)	ORDER Denying Motion For Sanctions Against John T. Winslow (RE: 1065). (CMR) (Entered: 10/09/2024)
93	10/16/2024	1129 (7 pgs; 2 docs)	ORDER Denying Motion To Stay Pending Appeal (RE: 1089). (CMR) (Entered: 10/16/2024)
94 (Also designated by Appellant)	10/22/2024	1135 (7 pgs)	RESPONSE to Objection to Claims (RE: Objection to Claim(s) 1098 , Objection to Claim(s) 1100 , Objection to Claim(s) 1102). Filed by Jun Dam (CMR) (Entered: 10/22/2024)

**II. DESIGNATION OF ITEMS FROM ADVERSARY PROCEEDING
DAM V. WALDRON, APN NO. 2:20-AP-80020-FPC**

Designation No.	Date	ECF No.	Description
95	06/05/2020	1 (160 pgs; 3 docs)	COMPLAINT. Fee Amount \$350. (Attachments: # 1 Exhibit) Nature of Suit: (72 (Injunctive relief - other)) (14 (Recovery of money/property - other)) (NNU) Additional attachment(s) added on 6/15/2020 (NNU). (Entered: 06/05/2020)
96	06/05/2020	none	Judge Frederick P. Corbit added to case. (NNU) (Entered: 06/05/2020)
97	06/05/2020	2 (2 pgs)	ADVERSARY Cover Sheet. Filed by Jun Dam (NNU) (Entered: 06/05/2020)
98	06/08/2020	3 (1 pg)	NOTICE of Scheduling Conference. Written Report due: 7/9/2020 . Scheduling Conference scheduled 7/14/2020 at 01:30 PM at (877) 402-9753, Access 3001392 - Spokane. (WJI) (Entered: 06/08/2020)
99	7/14/2020	9	MINUTE Entry Re: Scheduling Conference. HELD. The court continued the hearing 9/2 at 2 p.m. by telephone conference call to (509) 353-3183. Mr. Dam stated he may be filing an amended complaint. The court set deadlines: motion to dismiss to be filed by 7/22/20; any response to be filed by 8/12/20; and any reply to be filed by 8/26/20. The parties will provide documents via email due to Mr. Dam not being able to file electronically, in addition to the service requirements. (re: 3 Notice of Scheduling Conference) Appearances: Jun Dam, plaintiff; Pamela Egan, attorney for defendant/trustee of Giga Watt/Waldron; and trustee Mark Waldron. (JKB) Modified on 8/27/2020 for clarification.(JKB). (Entered: 07/15/2020)
100	07/23/2020	10 (182 pgs)	AMENDED COMPLAINT. Filed by Jun Dam (Re 1 Complaint). (NNU) (Entered: 07/23/2020)

Designation No.	Date	ECF No.	Description
101	07/30/2020	13 (3 pgs)	MOTION to Dismiss Adversary Proceeding. Filed by Pamela Marie Egan on behalf of Pamela M Egan, GIGA WATT INC, The Potomac Law Group, a Washington DC Limited Liability Partnership, Mark D. Waldron (Egan, Pamela) (Entered: 07/30/2020)
102	07/30/2020	14 (62 pgs; 2 docs)0	MEMORANDUM signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Pamela M Egan, GIGA WATT INC, The Potomac Law Group, a Washington DC Limited Liability Partnership, Mark D. Waldron (RE: Motion to Dismiss Adversary Proceeding 13). (Attachments: # 1 Exhibit 1)(Egan, Pamela) (Entered: 07/30/2020)
103	07/30/2020	15 (8 pgs)0	REQUEST for Judicial Notice in Support of Motion of Mark D Waldron, Pamela M Egan, and the Potomac Law Group to Dismiss the Amended Complaint (Filed as MOTION in Limine) (RE: Motion to Dismiss 13). Filed by Pamela Marie Egan on behalf of Pamela M Egan, GIGA WATT INC, The Potomac Law Group, a Washington DC Limited Liability Partnership, Mark D. Waldron (Egan, Pamela) DEPUTY Clerk Note: Docket text clarified; added related transaction. Modified on 9/2/2020 (NNU). (Entered: 07/30/2020)
104	07/30/2020	16 (3 pgs)	NOTICE of Motion and Time to Object; NOTICE of Hearing. Filed by Pamela Marie Egan on behalf of Pamela M Egan, GIGA WATT INC, The Potomac Law Group, a Washington DC Limited Liability Partnership, Mark D. Waldron (RE: Motion to Dismiss Adversary Proceeding 13 , MOTION in Limine 15). The Hearing date is set for 9/2/2020 at 02:00 PM at (509) 353-3183 for Telephonic Conference with Judge Corbit. (Egan, Pamela) DEPUTY Clerk Note: Docket text clarified. Modified on 8/4/2020 (NNU). (Entered: 07/30/2020)

Designation No.	Date	ECF No.	Description
105	07/31/2020	17 (2 pgs)	CERTIFICATE of Service.. Filed by Pamela Marie Egan on behalf of Pamela M Eagan, GIGA WATT INC, The Potomac Law Group, a Washington DC Limited Liability Partnership, Mark D. Waldron (RE: Motion to Dismiss Adversary Proceeding 13 , Memorandum 14 , MOTION in Limine 15 , Notice of Hearing 16). (Egan, Pamela) (Entered: 07/31/2020)
106	08/24/2020	18 (11 pgs)	MOTION to Withdraw Reference . Fee Amount \$181 and Notice . Filed by Jun Dam . (NNU) (Entered: 08/24/2020)
107	08/24/2020	19 (6 pgs)	MOTION For Leave of Court to Sue Trustee and Counsel and Notice . Filed by Jun Dam (NNU) (Entered: 08/24/2020)
108	08/24/2020	20 (39 pgs)	OBJECTION/Response to Motion to Dismiss Amended Complaint (RE: Motion to Dismiss Adversary Proceeding 13). Filed by Jun Dam (NNU) (Entered: 08/24/2020)
109	08/24/2020	21 (4 pgs)	NOTICE of Hearing., NOTICE of Motion and Time to Object., and CERTIFICATE of Service Filed by Jun Dam (RE: Motion to Dismiss Adversary Proceeding 13 , Motion to Withdraw Reference 18 , Motion For Leave of Court 19 , Objection 20). Hearing scheduled 9/2/2020 at 02:00 PM at 509-353-3183. Case Judge is Frederick P. Corbit (NNU) (Entered: 08/24/2020)
110	09/01/2020	22 (14 pgs)	REPLY signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Pamela M Eagan, GIGA WATT INC, The Potomac Law Group, a Washington DC Limited Liability Partnership, Mark D. Waldron (RE: Motion to Dismiss Adversary Proceeding 13 , RE: Response 20). (Egan, Pamela). Modified on 9/2/2020 (NNU). (Entered: 09/01/2020)

Designation No.	Date	ECF No.	Description
111	09/01/2020	23 (2 pgs)	CERTIFICATE of Service.. Filed by Pamela Marie Egan on behalf of Pamela M Eagan, GIGA WATT INC, The Potomac Law Group, a Washington DC Limited Liability Partnership, Mark D. Waldron (RE: Reply 22). (Egan, Pamela) (Entered: 09/01/2020)
112	09/02/2020	25	MINUTE Entry. Motion to Dismiss/Notice of Motion. HELD. The court heard argument on the dismissal and took the matter under advisement. As to the Motion to Withdraw and Motion for Leave, the motions were not properly scheduled today for hearing. As to the Motion to Withdraw, defendants may respond no later than 9/8/20; and plaintiff may reply no later no than 9/18/20. The court granted the defendants' Motion re judicial notice [ECF No. 16]. The court denied Mr. Dam's oral motion to stay the proceedings. (re: 13 Motion to Dismiss Adversary Proceeding 16 Notice of Hearing filed by Pamela M Eagan, GIGA WATT INC, The Potomac Law Group, a Washington DC Limited Liability Partnership, Mark D. Waldron, 18 Motion to Withdraw Reference filed by Jun Dam, 19 Motion For Leave filed by Jun Dam) Appearances: Jun Dam, plaintiff; Pamela Egan, attorney for trustee/defendants; Mark Waldron, trustee/defendant. Modified on 9/3/2020 from word perfect document for clarification. (JKB) (Entered: 09/03/2020)
113	09/08/2020	26 (16 pgs)	OBJECTION (RE: Motion to Withdraw Reference 18). Filed by Pamela Marie Egan on behalf of Pamela M Eagan, GIGA WATT INC, The Potomac Law Group, a Washington DC Limited Liability Partnership, Mark D. Waldron (Egan, Pamela) (Entered: 09/08/2020)

Designation No.	Date	ECF No.	Description
114	09/14/2020	27 (11 pgs)	OBJECTION to Motion For Leave of Court to Sue Trustee and Counsel (RE: MOTION For Leave of Court to Sue Trustee and Counsel and Notice 19). Filed by Pamela Marie Egan on behalf of Pamela M Egan, GIGA WATT INC, The Potomac Law Group, a Washington DC Limited Liability Partnership, Mark D. Waldron (Egan, Pamela) DEPUTY Clerk Note: Docket text clarified. Modified on 9/17/2020 (NNU). (Entered: 09/14/2020)
115	09/17/2020	28 (27 pgs; 2 docs)0	ORDER Granting Motion to Dismiss Adversary Proceeding (Re: MOTION to Dismiss Adversary Proceeding 13 , MOTION to Withdraw Reference 18). (NNU). Modified on 9/18/2020 (NNU). (Entered: 09/17/2020)
116	09/28/2020	30 (3 pgs)0	NOTICE of Appeal and Statement of Election to District Court. Fee Amount \$298. Filed by Jun Dam (RE: 28 Order on Motion to Dismiss Adversary Proceeding). (NNU) (Entered: 09/28/2020)
117	09/29/2020	32	APPEAL Transmittal to District Court. Appellant(s): Jun Dam. Appellee(s): Giga Watt Inc; Pamela M. Egan; Mark D. Waldron; The Potomac Law Group; CKR Law LLP. Case County: Douglas County. Date Notice of Appeal Filed: 9/28/2020. Date of Entry of Order on Appeal: 09/17/2020. Date Bankruptcy Case Filed: 06/05/2020. Fee Paid: No. Transmittal of Notice of Appeal mailed 9/29/2020 to Jun Dam and CKR Law LLP. All other parties, including the US Trustee, were electronically served. (RE: Order on Motion to Dismiss Adversary Proceeding 28 , Notice of Appeal and Statement of Election 30). Certificate of Record due by 11/18/2020. (NNU) (Entered: 09/29/2020)

Designation No.	Date	ECF No.	Description
118	10/09/2020	34 (6 pgs)	STATEMENT of Issues, APPELLEE Designation of Contents for Inclusion in Record of Appeal. Filed by Jun Dam (RE: 30 Notice of Appeal and Statement of Election). (TLJ) (Entered: 10/09/2020)
119	12/20/2020	40 (13 pgs)	VERBATIM Report/Transcript from hearing held on 07/14/2020. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 03/22/2021. Until that time the transcript may be viewed at the Bankruptcy Court. For information about how to contact the transcriber, call the Clerk's Office. (RE: related document(s) 9 MINUTE Entry Re: Scheduling Conference. HELD. The court continued the hearing 9/2 at 2 p.m. by telephone conference call to (509) 353-3183. Mr. Dam stated he may be filing an amended complaint. The court set deadlines: motion to dismiss to be filed by 7/22/20; any response to be filed by 8/12/20; and any reply to be filed by 8/26/20. The parties will provide documents via email due to Mr. Dam not being able to file electronically, in addition to the service requirements. (re: 3 Notice of Scheduling Conference) Appearances: Jun Dam, plaintiff; Pamela Egan, attorney for defendant/trustee of Giga Watt/Waldron; and trustee Mark Waldron. (JKB) Modified on 8/27/2020 for clarification.(JKB).). Notice of Intent to Request Redaction Deadline Due By 12/28/2020. Redaction Request Due By 01/11/2021. Redacted Transcript Submission Due By 01/20/2021. Transcript access will be restricted through 03/22/2021. (Cozza, Gina) (Entered: 12/20/2020)
120	12/20/2020	41 (29 pgs)	VERBATIM Report/Transcript from hearing held on 09/02/2020. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC

Designation No.	Date	ECF No.	Description
			<p>90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 03/22/2021. Until that time the transcript may be viewed at the Bankruptcy Court. For information about how to contact the transcriber, call the Clerk's Office. (RE: related document(s) 25 MINUTE Entry. Motion to Dismiss/Notice of Motion. HELD. The court heard argument on the dismissal and took the matter under advisement. As to the Motion to Withdraw and Motion for Leave, the motions were not properly scheduled today for hearing. As to the Motion to Withdraw, defendants may respond no later than 9/8/20; and plaintiff may reply no later no than 9/18/20. The court granted the defendants' Motion re judicial notice [ECF No. 16]. The court denied Mr. Dam's oral motion to stay the proceedings. (re: 13 Motion to Dismiss Adversary Proceeding 16 Notice of Hearing filed by Pamela M Eagan, GIGA WATT INC, The Potomac Law Group, a Washington DC Limited Liability Partnership, Mark D. Waldron, 18 Motion to Withdraw Reference filed by Jun Dam, 19 Motion For Leave filed by Jun Dam) Appearances: Jun Dam, plaintiff; Pamela Egan, attorney for trustee/defendants; Mark Waldron, trustee/defendant. Modified on 9/3/2020 from word perfect document for clarification. (JKB)). Notice of Intent to Request Redaction Deadline Due By 12/28/2020. Redaction Request Due By 01/11/2021. Redacted Transcript Submission Due By 01/20/2021. Transcript access will be restricted through 03/22/2021. (Cozza, Gina) (Entered: 12/20/2020)</p>

Designation No.	Date	ECF No.	Description
121	12/30/2020	42	CERTIFICATION that Record is Complete to Clerk of the District Court RE: Case Number 2:20-cv-00351-SAB. Deputy Clerk (NNU) of the US Bankruptcy Court for the Eastern District of Washington hereby certifies, pursuant to FRBP 8006(b), the record is complete for the purposes of appeal. Pursuant to FRBP 8010(b), this serves as notice the designated records are available electronically (RE: Notice of Appeal and Statement of Election ³⁰ , Statement of Issues ³⁴ , Appellee Designation, Status Report of Appeal 38). (NNU) DEPUTY Clerk Note: Last three digits of case number updated to reflect judge reassignment (from SMJ to SAB). Modified on 12/31/2020 (NNU). (Entered: 12/30/2020)
122	08/26/2021	None	ADVERSARY Proceeding 2:20-ap-80020 Closed . (JL) (Entered: 08/26/2021)

III. DESIGNATION OF ITEMS FROM ADVERSARY PROCEEDING WALDRON V. PERKINS, APN NO. 2:20-AP-80031-FPC

Designation No.	Date	ECF No.	Description
123	11/19/2020	⁶ (62 pgs ; 2 docs)	COMPLAINT. Filed by Pamela Marie Egan on behalf of Mark D. Waldron against all defendants (Re ¹ Complaint). (Attachments: # ¹ Exhibit A) (Egan, Pamela) DEPUTY Clerk Note: Redacted Adversary Complaint. Modified on 11/19/2020 (CMR). (Entered: 11/19/2020)

Designation No.	Date	ECF No.	Description
124	11/19/2020	7 (2 pgs)	CERTIFICATE/Submission of Signed Verification To Amended Verified Complaint signed by Mark D. Waldron. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Amended Complaint ⁶). (Egan, Pamela) DEPUTY Clerk Note: Docket text clarified. Modified on 11/20/2020 (NNU). (Entered: 11/19/2020)
125	11/20/2020	8 (3 pgs)	NOTICE Of Errata Re: Title of Amended Verified Complaint/CERTIFICATE signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Amended Complaint ⁶). (Egan, Pamela) DEPUTY Clerk Note: Docket text clarified. Modified on 11/23/2020 (NNU). (Entered: 11/20/2020)
126	12/31/2020	17 (2 pgs)	MOTION to Withdraw Reference . Fee Amount \$188. Filed by John D Munding on behalf of Perkins Coie LLP (Munding, John) (Entered: 12/31/2020)
127	12/31/2020	none	RECEIPT of Motion to Withdraw Reference(20-80031-FPC) [motion,mwdref] (188.00) Filing Fee. Receipt number A7743032. Fee amount 188.00 (RE: Motion to Withdraw Reference 17). (U.S. Treasury) (Entered: 12/31/2020)
128	12/31/2020	18 (15 pgs)	MEMORANDUM signed by John D. Munding, attorney for Defendants Perkins Coie LLP and Lowell Ness. Filed by John D Munding on behalf of Perkins Coie LLP (RE: Motion to Withdraw Reference 17). (Munding, John) (Entered: 12/31/2020)

Designation No.	Date	ECF No.	Description
129	01/07/2021	20 (5 pgs)	STATUS Report for Scheduling Conference 01/12/21; MOTION for Continuance of Deadline to File Scheduling Conference Report and Continuance of Scheduling Conference Pending Ruling by the District Court on Defendant's Motion for Order Granting Withdrawal of the District Court's Reference. Signed by the filer. Filed by John D Munding on behalf of Lowell Ness, Perkins Coie LLP. (Munding, John) DEPUTY Clerk Note: Motion for Continuance language added to docket text. Modified on 1/8/2021 (NNU). (Entered: 01/07/2021)
130	01/07/2021	22 (6 pgs)	WRITTEN Report per FRCP 26. Filed by Pamela Marie Egan on behalf of Mark D. Waldron. (Egan, Pamela) (Entered: 01/07/2021)
131	01/12/2021	26	MINUTE Entry. Scheduling Conference/Motion to Continue. HELD. The court continued the scheduling conference to 1-29 at 10 a.m. by telephone conference call to (509) 353-3183 based upon the agreement of counsel. See Order Continuing Scheduling Conference for more details. Appearances: Pamela Egan, attorney for plaintiff; Mark Waldron, plaintiff; John Munding and Ralph Cromwell, attorneys for defendants Perkins Coie LLP et al; Don Boyd, attorney for Andrey Kuzenny; and observing Dennis McGlothlin and Timothy Blood, attorneys for Jun Dam, plaintiff, Federal District Court Case 20-00464-SAB. (related document(s): 4 Notice of Scheduling Conference, 17 Motion to Withdraw Reference filed by Perkins Coie LLP, 20 Status Report filed by Lowell Ness,

Designation No.	Date	ECF No.	Description
			Perkins Coie LLP) (JKB) (Entered: 01/12/2021)
132	01/12/2021	27	ORDER CONTINUING SCHEDULING CONFERENCE: The parties will continue to meet and confer regarding consolidated discovery, jury trial issues, the removal of the related class action suit pending in District Court to this Court, and other matters. A report on such meeting will be filed by the Plaintiff with this Court by noon on January 28, 2021. The scheduling conference has been continued to 10 a.m. on January 29, 2021, by telephone conference call to (509) 353-3183. Pursuant to the agreement of all parties, the date for transmittal of the withdrawal of the reference documents to the District Court is continued until a reasonable time after the continued scheduling conference. Frederick P. Corbit, U.S. Bankruptcy Judge. This text entry constitutes the official order pursuant to LBR 9013-1(c)(4)(B). (RE: Minutes of Proceedings 26 , Notice of Scheduling 4 , Status Report for Scheduling Conference; Motion for Continuance of Deadline to File Scheduling Conference Report and Continuance of Scheduling Conference 20). (JKB) (Entered: 01/12/2021)
133	01/13/2021	28 (22 pgs)	ANSWER to Complaint. Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (RE: 6 Amended Complaint). (Cromwell, Ralph) (Entered: 01/13/2021)
134	01/14/2021	29 (18 pgs)	OBJECTION (RE: Motion to Withdraw Reference 17). Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Egan, Pamela) (Entered: 01/14/2021)

Designation No.	Date	ECF No.	Description
135	01/21/2021	30 (12 pgs)	REPLY signed by John D. Munding. Filed by John D Munding on behalf of Lowell Ness, Perkins Coie LLP (RE: Motion to Withdraw Reference 17 , Memorandum 18 , Objection 29). (Munding, John) (Entered: 01/21/2021)
136	01/28/2021	31 (8 pgs)	WRITTEN Report per FRCP 26. Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP. (Cromwell, Ralph) (Entered: 01/28/2021)
137	01/28/2021	32 (13 pgs)	WRITTEN Report per FRCP 26. Filed by Pamela Marie Egan on behalf of Mark D. Waldron. (Egan, Pamela) (Entered: 01/28/2021)
139	01/29/2021	34	MINUTE Entry. Continued Scheduling Conference. HELD. Based upon the agreement of counsel, the court scheduled a hearing on 3/25/21 at 1:30 p.m. via zoom invitation/open court. An order will be issued setting out the dates/deadlines and matters to be heard at the continued hearing. Discovery will be stayed on this litigation for four weeks. (re: 4 Notice of Scheduling Conference, 17 Motion to Withdraw Reference filed by Perkins Coie LLP) Appearances: Pamela Marie Egan, attorney for plaintiff; Mark Waldron, trustee/plaintiff; Ralph E. Cromwell and John Munding, attorneys for defendants Perkins Coie LLP and Lowell Ness; and Tommy O'Reardon, attorney for Jun Dam, et al, plaintiffs in Federal District Court Case 20-00464-SAB. (JKB) (Entered: 01/29/2021)

Designation No.	Date	ECF No.	Description
139	02/01/2021	35	ORDER SETTING BRIEFING SCHEDULE AND CONTINUED HEARING: Pursuant to the agreement of counsel, the following dates and deadlines were set: Plaintiff may file a motion to strike jury demand and a motion for determination of core non-core issues no later than 2/5/21; Defendants Perkins Coie LLP and Lowell Ness may file any further responses and a motion to compel arbitration no later than 2/26/21; Plaintiff may file any response to motion to compel arbitration no later than 3/12/21; Defendants Perkins Coie LLP and Lowell Ness may reply to any objection no later than 3/19/21; and Discovery in this litigation is stayed until 2/26/21. A hearing is scheduled to commence on the oral argument on the issues 3/25/21 at 1:30 p.m. via zoom invitation. SO ORDERED. Frederick P. Corbit, U.S. Bankruptcy Judge. This text entry constitutes the official order pursuant to LBR 9013-1(c)(4)(B). (RE: 4 Notice of Scheduling Conference, 34 Minutes of Proceedings, 17 Motion to Withdraw the Reference). (JKB) (Entered: 02/01/2021)
140	02/05/2021	36 (2 pgs)	MOTION to Strike Jury Demand (RE: 28 Answer to Complaint). Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Egan, Pamela) DEPUTY Clerk Note: Jury Demand added to docket text. Modified on 3/1/2021 (NNU). (Entered: 02/05/2021)
141	02/05/2021	37 (17 pgs)	MEMORANDUM signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Motion to Strike 36). (Egan, Pamela) (Entered: 02/05/2021)

Designation No.	Date	ECF No.	Description
142	02/05/2021	38 (2 pgs)	MOTION for a Determination That Proceeding is Core. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Egan, Pamela) DEPUTY Clerk Note: Docket text clarified to match pdf. Modified on 2/8/2021 (NNU). (Entered: 02/05/2021)
143	02/05/2021	39 (7 pgs)	MEMORANDUM signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: MOTION in Limine 38). (Egan, Pamela) (Entered: 02/05/2021)
144	02/26/2021	40 (19 pgs)	MOTION to Compel <i>Arbitration and Stay</i> . Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (Cromwell, Ralph) (Entered: 02/26/2021)
145	02/26/2021	41 (22 pgs)	RESPONSE/Opposition signed by Ralph E. Cromwell Jr. (RE: Motion to Strike 36). Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (Cromwell, Ralph) DEPUTY Clerk Note: Opposition added to docket text. Modified on 3/1/2021 (NNU). (Entered: 02/26/2021)
146	02/26/2021	42 (11 pgs)	RESPONSE/Opposition signed by Ralph E. Cromwell, Jr. (RE: MOTION in Limine 38). Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (Cromwell, Ralph) DEPUTY Clerk Note: Opposition added to docket text. Modified on 3/1/2021 (NNU). (Entered: 02/26/2021)

Designation No.	Date	ECF No.	Description
147	02/26/2021	43 (55 pgs; 7 docs)	DECLARATION signed by Ralph E. Cromwell, Jr.. Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (RE: Motion to Strike 36 , MOTION in Limine 38 , Motion to Compel 40). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6)(Cromwell, Ralph) (Entered: 02/26/2021)
148	03/12/2021	44 (25 pgs)	OBJECTION to Motion to Compel Arbitration and Stay (Filed as MEMORANDUM signed by Pamela M. Egan and corrected by court). Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Motion to Compel 40). (Egan, Pamela) Modified on 3/16/2021 (NNU). (Entered: 03/12/2021)
149	03/19/2021	46 (13 pgs)	REPLY signed by Ralph E Cromwell Jr (RE: Motion to Compel 40). Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (Cromwell, Ralph) (Entered: 03/19/2021)
150	04/22/2021	49 (14 pgs; 2 docs)	ORDER Granting Motion to Strike Jury Demand (Re: # 36) . (JL) (Entered: 04/22/2021)
151	04/22/2021	50 (8 pgs; 2 docs)	ORDER Denying MOTION for a Determination That Proceeding is Core (Re: # 38). (JL) (Entered: 04/22/2021)
152	04/22/2021	51 (10 pgs; 2 docs)	ORDER Denying Motion To Compel Arbitration and Stay (RE: 40) . (JL) (Entered: 04/22/2021)

Designation No.	Date	ECF No.	Description
153	04/27/2021	56	TRANSMITTAL of Motion for Withdrawal of Reference. Motioning Party(ies): John D Munding on behalf of Perkins Coie LLP. Responding Party(ies): Pamela Marie Egan on behalf of Mark D. Waldron. Case County: Douglas County. RE: Motion to Withdraw Reference 17 Memorandum 18 Certificate of Service 19 Reply 30). (NNU). Deputy Clerk Note: Entry corrected and Rels added. Modified on 4/28/2021 (KAC). . (Entered: 04/27/2021)
154	04/29/2021	57	CD Request by Transcriptionist: Gina Cozza, Invisible Business Solutions (RE: Minutes of Proceedings 26 , Minutes of Proceedings 34 , Minutes of Proceedings 48). (JRG) (Entered: 04/29/2021)
155	04/30/2021	58	NOTICE of Hearing/Status on Case-Scheduling (RE: Minutes of Proceedings 48). Hearing scheduled 5/4/2021 at 02:30 PM via Zoom Invitation with Judge Corbit. (JKB) (Entered: 04/30/2021)
156	05/04/2021	None	CASE Number from Appellate Court - District Court, Case Number: 21-cv-00148-SAB (RE: Motion to Withdraw Reference 17). (NNU) (Entered: 05/04/2021)
157	05/04/2021	60	MINUTE Entry. Status on Case. HELD. Discussion ensued as to the pending District Court cases and discovery issues. Counsel indicated a hearing is scheduled before Judge Bastian on the Motion to Withdraw the Reference on 6/13 at 1:30 p.m. and in the class action case defendants may file a motion to compel arbitration on or before 6/11. Defendants will be appealing the jury and arbitration orders in this case. The court set a status conference via zoom invitation on 6/23 at

Designation No.	Date	ECF No.	Description
			11:00 a.m. The court ordered counsel to meet and confer in May and required Plaintiff's counsel to file a status report be filed by 6/18, and any responses or comments by Defendants to be filed 2 days prior to the hearing. There is no stay on discovery in this case. Appearances: Pamela Egan, attorney for plaintiff; Mark Waldron, plaintiff; Jofrey M. McWilliams and John Munding; attorney for defendant Perkins Coie, et al; Don Boyd, attorney for defendant Andrey Kuzenny; and Timothy Blood and Dennis McGlothlin, attorneys for Jun Dam, et al, plaintiffs in Federal District Court Case 20-00464-SAB. (re: 58 Notice of Hearing/Status on Case 4 Notice of Scheduling Conference). (JKB) (Entered: 05/05/2021)
158	05/06/2021	61 (29 pgs)	NOTICE of Appeal and Statement of Election to District Court. Fee Amount \$298. Filed by John D Munding on behalf of Lowell Ness, Perkins Coie LLP (RE: 49 Order to Strike, 51 Order on Motion to Compel). (Munding, John) (Entered: 05/06/2021)
159	05/06/2021	None	RECEIPT of Notice of Appeal and Statement of Election(20-80031-FPC) [appeal,ntcaplel] (298.00) Filing Fee. Receipt number A7808902. Fee amount 298.00 (RE: Notice of Appeal and Statement of Election 61). (U.S. Treasury) (Entered: 05/06/2021)
160	05/06/2021	62 (13 pgs)	MOTION for Leave to Appeal. Filed by John D Munding on behalf of Lowell Ness, Perkins Coie LLP (Munding, John) (Entered: 05/06/2021)

Designation No.	Date	ECF No.	Description
161	05/07/2021	63	Notice of Appeal and Motion for Leave to Appeal Transmittal to District Court. Appellant(s): Perkins Coie LLP, and Lowell Ness. Appellee(s): Mark Waldron, Chapter 7 Trustee. Case County: Douglas. Date Notice of Appeal Filed: 5/06/2021. Date of Entry of Order(s) on Appeal: 4/22/2021. Date Bankruptcy Case Filed: 11/18/2020. Fee Paid: Yes. Transmittal of Notice of Appeal mailed N/A to N/A. All other parties, including the US Trustee, were electronically served. (RE: Order to Strike 49 , Order on Motion to Compel 51 , Notice of Appeal and Statement of Election 61 , Motion for Leave to Appeal 62). Certificate of Record due by 6/28/2021. (NNU) DEPUTY Clerk Note: Docket text clarified to include Motion for Leave to Appeal. Modified on 5/7/2021 (NNU). (Entered: 05/07/2021)
162	05/12/2021	none	CASE Number from Appellate Court, District Court, Case Number: 21-cv-00159-SAB (RE: Notice of Appeal and Statement of Election 61). (NNU) (Entered: 05/12/2021)
163	05/16/2021	65 (12 pgs)	VERBATIM Report/Transcript from hearing held on 01/12/2021. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 08/16/2021. Until that time the transcript may be viewed at the Bankruptcy Court. For information about how to contact the transcriber, call the Clerk's Office. (RE: related document(s) 26 MINUTE Entry. Scheduling Conference/Motion to Continue. HELD. The court continued the scheduling conference to 1-29 at 10 a.m. by telephone conference call to

Designation No.	Date	ECF No.	Description
			(509) 353-3183 based upon the agreement of counsel. See Order Continuing Scheduling Conference for more details. Appearances: Pamela Egan, attorney for plaintiff; Mark Waldron, plaintiff; John Munding and Ralph Cromwell, attorneys for defendants Perkins Coie LLP et al; Don Boyd, attorney for Andrey Kuzenny; and observing Dennis McGlothlin and Timothy Blood, attorneys for Jun Dam, plaintiff, Federal District Court Case 20-00464-SAB. (related document(s): 4 Notice of Scheduling Conference, 17 Motion to Withdraw Reference filed by Perkins Coie LLP, 20 Status Report filed by Lowell Ness, Perkins Coie LLP) (JKB)). Notice of Intent to Request Redaction Deadline Due By 5/24/2021. Redaction Request Due By 06/7/2021. Redacted Transcript Submission Due By 06/16/2021. Transcript access will be restricted through 08/16/2021. (Cozza, Gina) (Entered: 05/16/2021)
164	05/16/2021	66 (10 pgs)	VERBATIM Report/Transcript from hearing held on 01/29/2021. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 08/16/2021. Until that time the transcript may be viewed at the Bankruptcy Court. For information about how to contact the transcriber, call the Clerk's Office. (RE: related document(s) 34 MINUTE Entry. Continued Scheduling Conference. HELD. Based upon the agreement of counsel, the court scheduled a hearing on 3/25/21 at 1:30 p.m. via zoom invitation/open court. An order will be issued

Designation No.	Date	ECF No.	Description
			setting out the dates/deadlines and matters to be heard at the continued hearing. Discovery will be stayed on this litigation for four weeks. (re: 4 Notice of Scheduling Conference, 17 Motion to Withdraw Reference filed by Perkins Coie LLP) Appearances: Pamela Marie Egan, attorney for plaintiff; Mark Waldron, trustee/plaintiff; Ralph E. Cromwell and John Munding, attorneys for defendants Perkins Coie LLP and Lowell Ness; and Tommy O'Reardon, attorney for Jun Dam, et al, plaintiffs in Federal District Court Case 20-00464-SAB. (JKB)). Notice of Intent to Request Redaction Deadline Due By 5/24/2021. Redaction Request Due By 06/7/2021. Redacted Transcript Submission Due By 06/16/2021. Transcript access will be restricted through 08/16/2021. (Cozza, Gina) (Entered: 05/16/2021)
165	05/16/2021	67 (40 pgs)	VERBATIM Report/Transcript from hearing held on 03/25/2021. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 08/16/2021. Until that time the transcript may be viewed at the Bankruptcy Court. For information about how to contact the transcriber, call the Clerk's Office. (RE: related document(s) 48 MINUTE Entry. Motions. HELD. The court hearing argument of counsel and took the matters under advisement. The Motion to Withdraw the Reference and Scheduling Conference are continued to a date to be fixed. Appearances: Pamela Marie Egan, attorney for plaintiff; Mark Waldron,

Designation No.	Date	ECF No.	Description
			trustee/plaintiff; Ralph E. Cromwell, John Munding, and Jofrey McWilliam, attorneys for defendants Perkins Coie LLP and Lowell Ness; and Don Boyd, attorney for Andrey Kuzenny. (RE: Scheduling Conference ⁴ , Motion to Withdraw Reference ¹⁷ , Motion to Strike Jury Trial ³⁶ , MOTION for Determination That Proceeding is Core ³⁸ , Motion to Compel Arbitration and Stay ⁴⁰). (JKB)). Notice of Intent to Request Redaction Deadline Due By 5/24/2021. Redaction Request Due By 06/7/2021. Redacted Transcript Submission Due By 06/16/2021. Transcript access will be restricted through 08/16/2021. (Cozza, Gina) (Entered: 05/16/2021)
166	05/20/2021	68 (17 pgs)	APPELLANT Designation of Contents For Inclusion in Record On Appeal and STATEMENT of Issues on Appeal. Filed by John D Munding on behalf of Lowell Ness, Perkins Coie LLP (RE: 61 Notice of Appeal and Statement of Election, 63 Appeal Transmittal) (Munding, John). DEPUTY Clerk Note: Event clarified. Modified on 5/20/2021 (JL). (Entered: 05/20/2021)
167	06/18/2021	69 (23 pgs; 2 docs)	STATUS Report for Signed by and the filer.. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Minutes of Proceedings 60). (Attachments: # 1 Exhibit 1)(Egan, Pamela) (Entered: 06/18/2021)
168	06/21/2021	70 (5 pgs)	RESPONSE signed by Ralph E. Cromwell, Jr. (RE: Status Report ⁶⁹). Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (Cromwell, Ralph) (Entered: 06/21/2021)

Designation No.	Date	ECF No.	Description
160	06/23/2021	72	MINUTE Entry. Status Conference on Case. HELD. The court will issue a scheduling order setting out the dates and deadlines. The trial is scheduled to commence on 8/1/22-8/12/22 (10 days in duration). Appearances: Pamela Egan, attorney for plaintiff; Mark Waldron, plaintiff; Ralph E. Cromwell, Jofrey M. McWilliams and John Munding; attorney for defendant Perkins Coie, et al; Don Boyd, attorney for defendant Andrey Kuzenny; and Timothy Blood and Dennis McGlothlin, attorneys for Jun Dam, et al, plaintiffs in Federal District Court Case 20-00464-SAB (RE: Minutes of Proceedings 60) (JKB) (Entered: 06/23/2021)
170	06/24/2021	73 (3 pgs)	SCHEDULING Order (RE: Minutes of Proceedings 72). Pre-Trial Conference scheduled 7/13/2022 at 01:30 PM at (509) 353-3183 for Telephonic Conference with Judge Corbit. Ten day trial is scheduled to commence 8/1/2022 at 09:00 AM at Hrg location - US Post Office Bldg, 904 W Riverside Ave, 3rd Floor Courtroom, Spokane, WA. (NNU) (Entered: 06/24/2021)
171	06/29/2021	74	CERTIFICATION that Record is Complete to Clerk of the District Court RE: Case Number 21-cv-00159-SAB. Deputy Clerk (JRG) of the US Bankruptcy Court for the Eastern District of Washington hereby certifies, pursuant to FRBP 8006(b), the record is complete for the purposes of appeal. Pursuant to FRBP 8010(b), this serves as notice the designated records are available electronically (RE: Appeal Transmittal 63 , Statement of Issues 68). (JRG) (Entered: 06/29/2021)

Designation No.	Date	ECF No.	Description
172	11/12/2021	75 (6 pgs)	STIPULATED Motion for Extension of Current Case Deadlines. Signed by John Munding for Perkins Coie and Lowell Ness; Pamela M. Egan for Mark Waldron; Donald A. Boyd and Elon Berk for Andrey Kuzenny and the filer. (RE: Scheduling Order 73).. Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (Cromwell, Ralph) (Entered: 11/12/2021)
173	11/15/2021	76 (2 pgs)	ORDER Uploaded. Filed by Munding, John. (RE: 75) (Entered: 11/15/2021)
174	11/15/2021	77 (2 pgs)	JOINT Stipulated Scheduling Order (RE: STIPULATED Motion 75). Pre-Trial Conference scheduled 10/13/2022 at 01:30 PM (check with court for location). Trial scheduled for 11/1/2022 (check with court for location). (JL) (Entered: 11/15/2021)
175	02/18/2022	78 (6 pgs)	STIPULATED Motion for 60-Day Extension of Discovery Deadlines Without Change to Trial Date. Signed by Ralph E. Cromwell, Jr. and John Munding, on behalf of Perkins Coie LLP and Lowell Ness; Donald A. Boyd and Elon Berk, representing Andrey Vladimirovich Kuzenny and the filer. (RE: Scheduling Order 77).. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Egan, Pamela) (Entered: 02/18/2022)
176	02/18/2022	79 (4 pgs)	ORDER Uploaded. Filed by Egan, Pamela. (RE: 78) (Entered: 02/18/2022)

Designation No.	Date	ECF No.	Description
177	02/22/2022	80 (4 pgs)	ORDER Granting Stipulated Motion Regarding Change to Discovery Schedule ONLY. Pre-Trial Conference remains as previously scheduled 10/13/2022 at 01:30 PM and trial is scheduled for 11/1/2022 (check with court for locations) (RE: 78) . (NNU) Modified on 2/23/2022 (NNU). (Entered: 02/22/2022)
178	04/21/2022	81	NOTICE of Hearing/Status on Dispositive Motion Deadline (RE: Order on Stipulated Motion 80). Hearing scheduled 4/21/2022 at 01:30 PM at Zoom Invitation Meeting ID: 160 202 6907 Passcode 234197 phone number 6692545252. Text Entry Only. (JKB) (Entered: 04/21/2022)
179	04/21/2022	83	MINUTE Entry. Status Conference requested by counsel. HELD. Counsel discussed a possible mediation structure and requested an extension of the discovery cutoff in May due to the recent massive amount of document production. A stipulated motion and order will be submitted in this regard. Ms. Egan filed a motion in the main case to incur and pay expenses incident to discovery in Perkins adversary proceeding and requested a shortened notice period. The Court granted the motion and the request for shortened notice. In addition, the court would grant shortened notice on a protective order as to Circle Internet. Mr. Cromwell indicated he intends to file a motion to stay pending appeal re the arbitration issue, which is currently before the 9th Circuit Court of Appeals. Appearances: Pamela Egan, attorney for plaintiff; Mark Waldron, trustee/plaintiff; John Munding and Ralph Cromwell, attorneys for Perkins Coie, et al

Designation No.	Date	ECF No.	Description
			(related document(s): 81 Notice of Hearing (Text Only) (JKB) (Entered: 04/22/2022)
180	05/04/2022	84 (6 pgs)	STIPULATED Motion and Stipulation Regarding Protective Order. Signed by Bradley S. Keller, Ralph E. Cromwell, Jr., Jofrey M. McWilliam, and John Munding, on behalf of Perkins Coie LLP and Lowell Ness and the filer. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Egan, Pamela) DEPUTY Clerk Note: Stipulation added to docket text. Modified on 5/5/2022 (NNU). (Entered: 05/04/2022)
181	05/04/2022	85 (4 pgs)	ORDER Uploaded. Filed by Egan, Pamela. (RE: 84) (Entered: 05/04/2022)
182	05/06/2022	86 (4 pgs)	STIPULATED Protective Order (RE: 84) . (NNU) (Entered: 05/06/2022)
183	05/09/2022	87	NOTICE of Hearing/Continued Status Conference (RE: Order on Stipulated Motion 80). Hearing scheduled 5/10/2022 at 10:00 AM at Zoom Meeting ID: 161 633 7297Passcode: 493758 phone number 16692545252. (JKB) (Entered: 05/09/2022)
184	05/10/2022	89	MINUTE Entry. Status Conference. HELD. The court will allow counsel to extend discovery and the trial dates based upon comments of counsel and representations. Counsel will discuss future dates with the clerk. Appearances: Pamela Egan, attorney for plaintiff/trustee; John Munding and Ralph Cromwell, attorneys for defendants Perkins Coie, et al. (related document(s): 80 Order on Stipulated Motion, 83 Minutes of Proceedings) (JKB) (Entered: 05/10/2022)

Designation No.	Date	ECF No.	Description
185	05/25/2022	90 (10 pgs; 2 docs)	STIPULATED Motion for Amendment of Case Schedule. Signed by Pamela M. Egan, counsel for Mark D. Waldron, Trustee and the filer. (RE: Order on Stipulated Motion 80).. Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (Attachments: # 1 Proposed Form of Order Granting Stipulated Amendment to Case Schedule) (Cromwell, Ralph) (Entered: 05/25/2022)
186	06/21/2022	94 (4 pgs)	ORDER Uploaded. Filed by Egan, Pamela. (RE: 90) (Entered: 06/21/2022)
187	06/24/2022	95 (4 pgs)	STIPULATED Amended Scheduling Order. Pretrial Conference scheduled 3/7/2023 at 1:30 p.m.; Trial scheduled 3/21/2023 at 9:00 a.m. (location of hearings not identified) (RE: 90). (NNU) (Entered: 06/24/2022)
188	07/19/2022	96	NOTICE of Hearing-Status Conference on Request for Mediation (RE: Order on Stipulated Motion 95). Hearing scheduled 7/19/2022 at 01:30 PM at Zoom Invitation Meeting ID 161 704 1855Passcode: 863247One tap mobile+16692545252Text Entry Only. (JKB) (Entered: 07/19/2022)
189	07/19/2022	98	MINUTE Entry. Status on Request for Mediation. HELD. The court granted the request and will sign an order appointing Judge Hursh, U.S. Bankruptcy Judge from Montana, as the settlement judge in these proceedings. Judge Corbit intends to sign the order by the end of the week. Appearances: Pamela Egan, attorney for plaintiff; Mark Waldron, trustee/plaintiff; Ralph Cromwell and John Munding, attorneys for Perkins Coie, et al; and Timothy Blood and Dennis McGlothlin, attorneys for Jun Dam, et al, plaintiffs in

Designation No.	Date	ECF No.	Description
			Federal District Court Case 20-00464-SAB. (related document(s): 96 Notice of Hearing (Text Only)) (JKB) (Entered: 07/19/2022)
190	07/20/2022	99	ORDER. Based on the request of the parties for the appointment of a settlement judge, Benjamin P. Hursh, United States Chief Bankruptcy Judge for the District of Montana, is appointed as the settlement judge in this adversary proceeding; the parties shall contact Judge Hursh's Chambers and schedule a mutually convenient date and time for the settlement conference. The Plaintiff and Defendants, if they jointly agree, may invite other interested parties to participate in the settlement conference. SO ORDERED. Frederick P. Corbit, U.S. Bankruptcy Judge, TEXT ENTRY ORDER; NO DOCUMENT CREATED. (RE: Minutes of Proceedings 98). (JKB) (Entered: 07/20/2022)
191	07/21/2022	100 (3 pgs; 2 docs)	SCHEDULING Order. A scheduling conference shall be held on Thursday, August 11, 2022, at 11:00 AM MST by telephone conference call at 551-285-1373; conference ID No. 16162574053## (RE: Order 99). (JRG) (Entered: 07/21/2022)
192	07/26/2022	104 (9 pgs; 2 docs)	MOTION to Modify (RE: 95 Order on Stipulated Motion). Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (Attachments: # 1 Proposed Form of Order Granting Extension of Deadline to Join Parties) (Cromwell, Ralph) (Entered: 07/26/2022)

Designation No.	Date	ECF No.	Description
193	07/27/2022	105 (4 pgs)	NOTICE of Hearing.. Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (RE: Motion to Modify Order 104). The Hearing date is set for 8/11/2022 at 01:30 PM at Zoom Invitation Meeting ID and Passcode. (Cromwell, Ralph) (Entered: 07/27/2022)
194	08/11/2022	107	MINUTE Entry. Motion to Modify Stipulated Order Re Extending Deadlines to Add Parties. HELD. Based upon no objections being filed to the Motion and comments of counsel on the record, the court will grant the Motion. Plaintiff's counsel indicated she intends to amend the complaint in approximately three weeks and has conferred with defendants' counsel in this regard. (related document(s): 104 Motion to Modify Order filed by Lowell Ness, Perkins Coie LLP) Appearances: Ralph E. Cromwell and John D. Munding, attorney for defendants; and Pamela Marie Egan, attorney for plaintiff/Mark D. Waldron (JKB) (Entered: 08/11/2022)
195	09/15/2022	111 (13 pgs; 2 docs)	NOTICE of Motion and Time to Object.. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Complaint 1 , Amended Complaint 6). (Attachments: # 1 Exhibit A)(Egan, Pamela) (Entered: 09/15/2022)
196	09/26/2022	114 (6 pgs)	STATUS Report for <i>Notice of Oral Argument Setting in 9th Circuit</i> . Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP. (Cromwell, Ralph) (Entered: 09/26/2022)

Designation No.	Date	ECF No.	Description
197	09/26/2022	115 (96 pgs; 3 docs)	MOTION to Amend Complaint and Notice . (RE: 6 Complaint) Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Attachments: # 1 Exhibit 1 # 2 Exhibit 2) (Egan, Pamela) DEPUTY Clerk Note: Document includes notice. Modified on 9/27/2022 (NNU). (Entered: 09/26/2022)
198	09/26/2022	116 (9 pgs)	MEMORANDUM <i>in Support of Trustee's Motion to Amend Complaint</i> signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: MOTION to Amend Complaint 115). (Egan, Pamela) (Entered: 09/26/2022)
199	09/26/2022	117 (3 pgs)	DECLARATION <i>in Support of Trustee's Motion to Amend Complaint</i> signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: MOTION to Amend Complaint 115). (Egan, Pamela) (Entered: 09/26/2022)
200	10/05/2022	119 (3 pgs)	ORDER RE: Settlement Conference. The settlement conference shall be held on December 16, 2022, at 9:00 a.m. at the U.S. Bankruptcy Court for the Western District of Washington, 700 Stewart St., Suite 6301, in Seattle, Washington. Settlement Judge is the Hon. Benjamin P. Hursh. (JRG) Modified on 10/5/2022 (JRG). (Entered: 10/05/2022)

Designation No.	Date	ECF No.	Description
201	10/17/2022	120 (342 pgs; 8 docs)	OBJECTION (RE: MOTION to Amend Complaint 115). Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (Attachments: # 1 Affidavit of Cromwell ISO Opposition to Motion to Amend # 2 Exhibit Nos. 1-6 ISO Cromwell Affidavit # 3 Exhibit Nos. 7-16 ISO Cromwell Affidavit # 4 Exhibit Nos. 17-23 ISO Cromwell Affidavit # 5 Exhibit Nos. 24-26 ISO Cromwell Affidavit # 6 Exhibit Nos. 27-32 ISO Cromwell Affidavit # 7 Proposed Form of Order Denying Motion to Amend) (Cromwell, Ralph) (Entered: 10/17/2022)
202	10/24/2022	121 (95 pgs; 4 docs)	REPLY signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: MOTION to Amend Complaint 115). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)(Egan, Pamela) (Entered: 10/24/2022)
203	10/24/2022	122 (5 pgs)	DECLARATION <i>in Support of Trustee's Reply to Perkins' and Ness' Opposition to Trustee's Motion to Amend Complain</i> signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: MOTION to Amend Complaint 115). (Egan, Pamela) (Entered: 10/24/2022)
204	10/24/2022	123 (171 pgs; 5 docs)	MOTION in Limine. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 (Part 1 of 3) # 3 Exhibit 2 (Part 2 of 3) # 4 Exhibit 2 (Part 3 of 3)) (Egan, Pamela) (Entered: 10/24/2022)


Designation No.	Date	ECF No.	Description
205	10/24/2023	124 (3 pgs)	MOTION to Strike Affidavit of Ralph E. Cromwell, Jr. Regarding Trustee's Motion to Amend Complaint (RE: 120 Objection). Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Egan, Pamela) DEPUTY Clerk Note: Docket text clarified. Modified on 10/25/2022 (NNU). (Entered: 10/24/2022)
206	10/28/2022	125 (6 pgs)	STATUS Report for <i>Notice of 9th Circuit Ruling</i> . Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP. (Cromwell, Ralph) (Entered: 10/28/2022)
207	10/31/2022	126 (2 pgs)	NOTICE of Hearing. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: MOTION to Amend Complaint 115 , MOTION in Limine 123 , Motion to Strike 124). Hearing scheduled 11/15/2022 at 1:30 PM at Zoom Invitation Meeting ID: 160 692 2376 and Passcode. Phone number 1-669-254-5252. (Egan, Pamela) DEPUTY Clerk Note: Hearing information added to docket text. Modified on 11/1/2022 (NNU). (Entered: 10/31/2022)
208	11/03/2022	127 (9 pgs)	OBJECTION to <i>Trustee's Motion to Strike Affidavit of Ralph E. Cromwell, Jr. Re Trustee's Motion to Amend Compl</i> signed by <i>Ralph E. Cromwell, Jr.</i> (Filed as RESPONSE to <i>Trustee's Motion to Strike Affidavit of Ralph E. Cromwell, Jr. Re Trustee's Motion to Amend Compl</i> signed by <i>Ralph E. Cromwell, Jr.</i> and corrected by court) (RE: Motion to Strike 124). Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (Cromwell, Ralph) (Entered: 11/03/2022)

Designation No.	Date	ECF No.	Description
209	11/10/2022	128 (58 pgs; 11 docs)	REPLY signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Objection 127 , Motion to Strike 124). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 2-1 # 4 Exhibit 3 # 5 Exhibit 4 # 6 Exhibit 5 # 7 Exhibit 6 # 8 Exhibit 7 # 9 Exhibit 8 # 10 Exhibit 9)(Egan, Pamela). Modified on 11/14/2022 (NNU). (Entered: 11/10/2022)
210	11/20/2022	129 (8 pgs)	DECLARATION <i>in Support of T'ee's Reply to Perkins' and Ness' Opp. to T'ee's Mot. to Strike Cromwell Aff.</i> signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Motion to Strike 124). (Egan, Pamela) (Entered: 11/10/2022)
211	11/20/2022	130 (47 pgs; 11 docs)	MOTION in Limine. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J) (Egan, Pamela) (Entered: 11/10/2022)
212	11/15/2022	132	MINUTE Entry. Motions. HELD. The court heard argument of counsel and took the matter under advisement. Appearances: Pamela Egan, attorney for trustee/plaintiff; Mark Waldron, plaintiff; Attorneys for defendants Perkins Coie John D Munding; Ralph E Cromwell, Jr.; and Jofrey M. McWilliam. (RE: MOTION in Limine 130 , Motion to Strike 124 , MOTION in Limine 123 , MOTION to Amend Complaint 115). (JKB) (Entered: 11/15/2022)

Designation No.	Date	ECF No.	Description
213	11/23/2022	133	STATUS Report for <i>Oral Argument - Court of Appeals</i> . Filed by Pamela Marie Egan on behalf of Mark D. Waldron. (Attachments: # 1 Exhibit A)(Egan, Pamela) (Entered: 11/23/2022)
214	11/23/2022	134 (15 pgs)	ORDER Granting Trustee's Motion to Amend Complaint, Motions to Take Judicial Notice and Denying Motion to Strike Cromwell Affidavit (RE: 115), Granting Motion in Limine (RE: 123), Denying Motion to Strike (RE: 124), Granting Motion in Limine (RE: 130). (NNU) (Entered: 11/23/2022)
215	11/23/2022	135 (91 pgs; 4 docs)	AMENDED COMPLAINT. Filed by Pamela Marie Egan on behalf of Mark D. Waldron against Lowell Ness, Perkins Coie LLP, Timur Usmanov (Re 1 Complaint, 6 Amended Complaint). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Egan, Pamela) (Entered: 11/23/2022)
216	11/28/2022	136 (1 pg)	SUMMONS Re-Issued. (NNU) (Entered: 11/28/2022)
217	12/07/2022	139 (46 pgs)	ANSWER to Complaint, THIRD-PARTY Complaint against <i>JUN DAM, Individually and as Representative of a Class of Similarly Situated Token Purchasers</i> .. Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP. (Cromwell, Ralph) (Entered: 12/07/2022)
218	12/13/2022	140 (1 pg)	NOTICE of Scheduling Conference. Written Report due: 2/9/2023 . Scheduling Conference scheduled 2/14/2023 at 01:30 PM at Zoomgov.com or call 669-254-5252, Meeting ID: 160 692 2376. (NNU) (Entered: 12/13/2022)

Designation No.	Date	ECF No.	Description
219	12/13/2022	141 (2 pgs)	MOTION to Dismiss Third-Party Complaint for Misjoinder and Notice (RE: Third-Party Complaint 139). Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Egan, Pamela). DEPUTY Clerk Note: Entry clarified. Modified on 12/14/2022 (CMR). (Entered: 12/13/2022)
220	12/13/2022	142 (8 pgs)	MEMORANDUM <i>in Support of Trustee's Motion to Dismiss Third-Party Complaint for Misjoinder</i> signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Motion to Dismiss Party 141). (Egan, Pamela) (Entered: 12/13/2022)
221	12/13/2022	143 (2 pgs)	DECLARATION <i>of Pamela M. Egan in Support of Trustee's Motion to Dismiss Third-Party Complaint for Misjoinder</i> signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Motion to Dismiss Party 141). (Egan, Pamela) (Entered: 12/13/2022)
222	12/13/2022	144 (26 pgs; 3 docs)	REQUEST for Judicial Notice (Filed as MOTION in Limine and corrected by court). Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Attachments: # 1 Exhibit 1 # 2 Exhibit 2) (Egan, Pamela) Modified on 12/14/2022 (CMR). (Entered: 12/13/2022)
223	12/23/2022	145 (6 pgs; 2 docs)	NOTIFICATION of <i>Ninth Circuit Ruling Dismissing Arbitration Appeal</i> (Filed as STATUS Report and corrected by court) Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Order on Motion to Compel 51). (Attachments: # 1 Exhibit A)(Egan, Pamela) Modified on 12/27/2022 (CMR). (Entered: 12/23/2022)

Designation No.	Date	ECF No.	Description
224	01/03/2023	146 (22 pgs)	OBJECTION (RE: Motion to Dismiss Party 141). Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (Cromwell, Ralph) (Entered: 01/03/2023)
225	01/03/2023	147 (34 pgs)	DECLARATION <i>In Support of Opposition to MTD re 3rd Party</i> signed by <i>Ralph E. Cromwell, Jr.</i> . Filed by Ralph E Cromwell Jr on behalf of Lowell Ness, Perkins Coie LLP (RE: Motion to Dismiss Party 141). (Cromwell, Ralph) (Entered: 01/03/2023)
226	01/04/2023	148 (1 pg)	SUMMONS Re-Issued. (CMR) (Entered: 01/04/2023)
227	01/10/2023	149 (17 pgs)	REPLY signed by Pamela M. Egan. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Objection 146). (Egan, Pamela) (Entered: 01/10/2023)
228	02/03/2023	153 (3 pgs)	NOTICE of Appearance. Filed by Reid G Johnson on behalf of Timur Usmanov. (Johnson, Reid) (Entered: 02/03/2023)
229	02/03/2023	154 (26 pgs)	ANSWER to Complaint. Filed by Reid G Johnson on behalf of Timur Usmanov. (Johnson, Reid) (Entered: 02/03/2023)
230	02/07/2023	155 (2 pgs)	JOINT STATUS Report for <i>Status of Mediation</i> . Signed by Ralph E. Cromwell, Jr., counsel for Perkins Coie LLP and Lowell Ness and the filer. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Notice of Scheduling Conference 140). (Egan, Pamela) (Entered: 02/07/2023)

Designation No.	Date	ECF No.	Description
231	02/13/2023	157 (4 pgs)	JOINT STATUS Report for <i>Scheduling Conference</i> . Signed by Pamela Egan Attorney for Mark D. Waldron, as Ch. 7 Trustee and the filer. Filed by Ralph E Cromwell Jr on behalf of Perkins Coie LLP. (Cromwell, Ralph) (Entered: 02/13/2023)
232	03/09/2023	160	MINUTE Entry Re: Scheduling Conference. HELD. The court continued the hearing to 3-28-23 at 1:30 p.m. at Zoomgov.com or call 669-254-5252, Meeting ID: 160 692 2376. Counsel have had successful mediation efforts and requested additional time to work out the non-economic issues. Appearances: Pamela Egan, attorney for plaintiff/trustee; and Ralph Cromwell, attorney for defendant Perkins Coie et al (RE: Notice of Scheduling Conference 140 , Minutes of Proceedings 159). (JKB) (Entered: 03/09/2023)
233	03/13/2023		 PDF with attached Audio File. Court Date & Time [3/9/2023 1:31:20 PM]. File Size [3784 KB]. Run Time [00:07:53]. (JoleneBritton). (Entered: 03/13/2023)
234	03/28/2023	162	MINUTE Entry Re: Continued Scheduling Conference. HELD. Counsel discussed the ongoing settlement, the District Court case, and the notice requirements regarding the settlement. The Court continued the hearing to 04/11/2023 at 01:30 PM at Zoomgov.com or call 669-254-5252, Meeting ID: 160 692 2376. Appearances: Pamela Egan, attorney for plaintiff/trustee; and John Munding and Ralph Cromwell, attorney for defendants Perkins Coie et al (RE: Notice of Scheduling Conference 140). (JKB) (Entered: 03/28/2023)

Designation No.	Date	ECF No.	Description
235	04/11/2023	166	MINUTE Entry Re: Continued Scheduling Conference. HELD. The court continued the hearing to 04/25/2023 at 1:30 p.m. at Zoomgov.com or call 669-254-5252, Meeting ID: 160 692 2376. Counsel discussed they continue to work on the procedure and language regarding the settlement. Appearances: Pamela Egan, attorney for plaintiff/trustee; and John Munding and Ralph Cromwell, attorneys for Perkins Coie et al. (RE: Minutes of Proceedings 162). (JKB) (Entered: 04/11/2023)
236	04/25/2023	168	MINUTE Entry Re: Continued Hearing - Scheduling Conference. HELD. Hearing rescheduled 05/02/2023 at 02:00 PM at Zoomgov.com or call 669-254-5252, Meeting ID: 160 692 2376. Counsel for the plaintiff indicated progress is not being made with the class parties and will be in contact with Judge Hursh for further involvement. Appearances: Pamela Egan, attorney for plaintiff/trustee; and John Munding and Ralph Cromwell, attorneys for Perkins Coie et al (RE: Minutes of Proceedings 166). Hearing scheduled 05/02/2023 at 02:00 PM at Zoomgov.com or call 669-254-5252, Meeting ID: 160 692 2376. Case Judge is Frederick P. Corbit (JKB) (Entered: 04/25/2023)

APPELLEE'S DESIGNATION OF RECORD -- 60

Designation No.	Date	ECF No.	Description
237	05/02/2023	170	MINUTE Entry Re: Continued Scheduling Conference. HELD. The court continued the hearing upon request of counsel to 05/16/2023 at 1:30 PM at Zoomgov.com or call 669-254-5252, Meeting ID: 160 692 2376. Counsel are deciphering how to proceed and requested additional time. Appearances: John D. Munding and Ralph E. Cromwell, Jr., attorneys for defendants Perkins Coie et al; and Pamela Marie Egan, attorney for plaintiff/trustee. (RE: Notice of Scheduling Conference 140 , Minutes of Proceedings 168). (JKB) (Entered: 05/02/2023)
238	05/02/2023	171	NOTICE to Court Regarding Settlement (RE: Order 99). (JKB) (Entered: 05/02/2023)
230	05/16/2023	173	MINUTE Entry. Continued Scheduling Conference. HELD. Counsel are discussing settlement matters and the Court awaits further details. Appearances: Pamela Egan, attorney for plaintiff/trustee; and Ralph Cromwell, attorney for defendants Coie Perkins et al. (RE: Minutes of Proceedings 170). (JKB) (Entered: 05/16/2023)
240	08/01/2024	174 (9 pgs; 2 docs)	STIPULATION of Dismissal <i>Stipulation to Dismiss Trustee's Claim Against Timur Usmanov</i> . Filed by Pamela Marie Egan on behalf of Mark D. Waldron. (Attachments: # 1 Exhibit A)(Egan, Pamela) (Entered: 08/01/2024)
241	08/01/2024	175 (2 pgs)	NOTICE of Dismissal by Plaintiff <i>Notice of Dismissal of Trustee's Claim Against Timur Usmanov</i> . Filed by Pamela Marie Egan on behalf of Mark D. Waldron. (Egan, Pamela) (Entered: 08/01/2024)

Designation No.	Date	ECF No.	Description
242	08/02/2024	176 (2 pgs)	STIPULATION of Dismissal <i>Stipulated Dismissal of Action With Prejudice and Without Costs or Fees to Either Side</i> . Filed by Pamela Marie Egan on behalf of Mark D. Waldron. (Egan, Pamela) (Entered: 08/02/2024)

**IV. DESIGNATION OF ITEMS FROM ADVERSARY PROCEEDING
WALDRON V. DAM, APN NO. 2:20-AP-80053-FPC**

Designation No.	Date	ECF No.	Description
243	02/23/2022	38 (31 pgs)	ORDER Denying Motion to Dismiss Adversary Proceeding (RE: 21) and Granting Motion For Preliminary Injunction (RE: 2). (JL) (Entered: 02/23/2022)
244	03/08/2022	40 (36 pgs; 2 docs)	NOTICE of Appeal and Statement of Election to District Court. Fee Amount \$298. Filed by Dennis J. McGlothin on behalf of Jun Dam (RE: 38 Order on Motion For Preliminary Injunction, Order on Motion to Dismiss Adversary Proceeding, 39 Order on Motion For Preliminary Injunction, Order on Motion to Dismiss Adversary Proceeding). (Attachments: # 1 Exhibit A)(McGlothin, Dennis) (Entered: 03/08/2022)
245	10/19/2023	83 (8 pgs; 2 docs)	MOTION for Comfort Order Regarding Preliminary Injunction and Notice (RE: 38 Order on Motion For Preliminary Injunction, Order on Motion to Dismiss Adversary Proceeding). Filed by Pamela Marie Egan on behalf of Mark D. Waldron (Attachments: # 1 Exhibit A) (Egan, Pamela) DEPUTY Clerk Note: Entry clarified. Modified on 10/20/2023 (CMR). (Entered: 10/19/2023)

Designation No.	Date	ECF No.	Description
246	10/19/2023	84	CERTIFICATE of Service. I, Pamela M. Egan, certify under penalty of perjury that the following is true and correct. I am over the age of eighteen. On October 19, 2023, I filed the following document(s): Chapter 7 Trustee's Motion for Comfort Order Regarding Preliminary Injunction and Notice Thereon, ECF No. 83. The recipient(s) name, address and/or email: tblood@bholaw.com, efile@bholaw.com, toreardon@bholaw.com, lhurst@bholaw.com, docs@westwalaw.com. Registered ECF participants are served upon filing of the document(s) based on receipt of a Notice of Electronic Filing.. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Motion to Modify Order ⁸³). (Egan, Pamela) (Entered: 10/19/2023)
247	11/10/2023	85	DECLARATION of No Objections. Filer represents to the Court, under penalty of perjury, that the Motion (Docket No. ⁸³) and Notice (Docket No. ⁸³), were served as documented in the Certificate of Service (Docket No. 84). No objections have been filed. Filed by Pamela Marie Egan on behalf of Mark D. Waldron (RE: Motion to Modify Order ⁸³). (Egan, Pamela) (Entered: 11/10/2023)
248	11/10/2023	86 (2 pgs)	ORDER Uploaded. Filed by Egan, Pamela. (RE: ⁸³) (Entered: 11/10/2023)
249	11/21/2023	87 (2 pgs)	ORDER Regarding Preliminary Injunction (RE: ⁸³). (CMR) (Entered: 11/21/2023)

Dated: October 22, 2024

POTOMAC LAW GROUP PLLC

By: /s/ Pamela M. Egan

Pamela M. Egan (WSBA No. 54736)

*Counsel to the Trustee and the Appellee
Herein*